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11 Environment and Natural Resources Division
12 United States Department of Justice
13 P.O. Box 7611
14 Washington, DC 20044

11 *Attorneys for Plaintiff United States of America*

12 **IN THE UNITED STATES DISTRICT COURT**
13 **FOR THE DISTRICT OF ARIZONA**

14 United States of America,
15 Plaintiff,
16 v.
17 Gear Box Z, Inc.
18 Defendant.

No. CV-20-08003-PHX-JJT

**DECLARATION IN SUPPORT OF
UNITED STATES' MOTION FOR
PRELIMINARY INJUNCTION**

21 **DECLARATION OF ROSE GALER**
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1 I, Rose Galer, declare as follows under penalty of perjury:

2 1. I am currently a Physical Scientist employed by the U.S.
3 Environmental Protection Agency Region 9 (“EPA Region 9”), Enforcement and
4 Compliance Assurance Division. I have been with EPA Region 9’s Enforcement
5 and Compliance Assurance Division since August 2016.
6

7 2. EPA Region 9 is the regional office of EPA that implements and
8 enforces federal environmental laws in California, Arizona, Nevada, Hawaii, the
9 Pacific Islands, and 148 tribal nations. EPA Region 9 is headquartered in San
10 Francisco, California.
11

12 3. Since August 2016, I have been a scientist in the Air Section of EPA
13 Region 9’s Enforcement and Compliance Assurance Division. My responsibilities
14 include compliance inspections, investigations, and case development.
15

16 4. As part of my duties as a scientist in the Air Section, I am
17 responsible for investigating potential enforcement actions and supporting
18 enforcement actions brought by EPA Region 9 for violations of the Clean Air Act
19 (“CAA”) and its implementing regulations. My cases include enforcement of the
20 defeat device prohibition under Section 203(a)(3) of the CAA.
21

22 5. I am the Region 9 lead scientist in this investigation. My duties
23 consist of identifying potential violations, drafting and reviewing information
24 requests, reviewing and analyzing case files, calculating emission increases based
25 on information obtained from the person or company we are investigating, and
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1 calculating penalties according to EPA policy and guidance. I have conducted
2 other aftermarket defeat device investigations and assisted other EPA Region 9
3 environmental scientists and engineers with the same.

4 6. Mobile sources are regulated under the CAA in order to protect
5 human health and the environment by reducing harmful emissions of nitrogen
6 oxides (“NOx”), particulate matter (“PM”), carbon monoxide (“CO”), and other
7 types of air pollution.
8

9 7. The CAA has specific compliance provisions which establish
10 emission standards and test procedures for each vehicle or engine type and year of
11 manufacture. 40 C.F.R. Part 86 (emission standards for parts and components for
12 diesel trucks). In order to ensure emission standards are met, EPA administers a
13 certification program for every vehicle sold in the United States. Vehicle
14 manufactures must obtain a certificate of conformity (“COC”) from EPA
15 demonstrating the vehicles have emission controls that meet emission standards.
16 40 C.F.R. § 86.2843-01. Motor vehicle and engine manufacturers employ many
17 devices and elements of design in order to meet emission standards. An “element
18 of design” means “any control system (i.e., computer software, electronic control
19 system, emission control system, computer logic), and/or control system
20 calibrations, and/or the results of system interaction, and/or hardware items on a
21 motor vehicle or motor vehicle engine.” 40 C.F.R. § 86.094-2. Vehicles are
22 programmed with Certified Stock Calibrations, which is the vehicle software
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1 designed by the vehicle manufacturers that performs necessary software emission
2 control functions. Manufacturers also employ hardware devices as emission
3 control systems to manage and treat exhaust to reduce levels of regulated
4 pollutants from being created or emitted into the ambient air.
5

6 8. For diesel trucks, emission control hardware devices include diesel
7 particulate filters (“DPF”), exhaust gas recirculation (“EGR”) systems, diesel
8 oxidation catalysts (“DOC”), nitrogen oxide adsorbing catalysts (“NAC”), and
9 selective catalytic reduction (“SCR”) systems. Manufacturers equip vehicles with
10 electronic control modules (“ECMs”) to govern parameters that affect engine
11 combustion, performance, and operation (e.g., air-fuel ratio, fuel injection timing,
12 fuel quantity, fuel injection pressure, and fuel injection pulse width and
13 temperature), to monitor and control the emission control devices and onboard
14 diagnostics (“OBD”), to detect problems with emissions related systems, alert
15 drivers to these problems, and store electronically generated malfunction
16 information. When a problem is detected, the OBD will illuminate a warning
17 lamp on the vehicle instrument panel and may force the engine to derate and enter
18 “limp-home mode.” These parts and functions are part of a vehicle’s emission
19 control system.
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24 9. The manufacture, sale, or offer to sell parts or components with a
25 principle effect to bypass, defeat, or render inoperative any device or element of
26 design installed on a motor vehicle is a violation of Section 203(a)(3) the CAA.
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1 These parts are commonly referred to as aftermarket “defeat devices,” which
2 include hardware and software defeat devices. Hardware defeat devices bypass or
3 remove the hardware emission controls and software defeat devices reprogram or
4 override the related software emission control programming (tunes) using a device
5 called a “tuner” with preloaded tunes.
6

7 **A. Gear Box Z – Aftermarket Defeat Device Business**

8 10. Gear Box Z, Inc. (“GBZ”) is a small business that manufactures and
9
10 sells aftermarket defeat device products for diesel trucks to wholesalers,
11 distributors, retailers, and directly to end-users. GBZ primarily operates online
12 through its website www.gearboxz.com, where it sells GBZ products and other
13 brands of aftermarket products. GBZ also sells through third-party online
14 retailers, such as Amazon and eBay.
15

16 11. Starting in August 2016, EPA investigators observed numerous
17 products on GBZ’s website that appeared to be aftermarket defeat devices. GBZ’s
18 website contained both hardware and software aftermarket defeat device products
19 that were marketed and advertised for purposes of enhancing vehicle performance,
20 such as power and increased fuel economy. EPA further identified GBZ’s
21 products to be defeat devices after reviewing other aftermarket retailers’ websites
22 that sold the same defeat devices GBZ offered for sale. For example, the install
23 instructions for an AFE straight pipe GBZ and AFE offered for sale explicitly
24 discuss the removal of emission controls such as “remove the stock exhaust” and
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1 “disconnect sensors at the connection.” Additionally, EPA discovered other
2 online sources of evidence suggesting that GBZ products were defeat devices such
3 as publicly available videos on YouTube and postings on Facebook providing
4 video tutorials for GBZ products.

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6 **B. CAA Section 208 Information Requests**

7 12. EPA Region 9 issues information requests under Section 208 of the
8 CAA to, among other things, investigate whether a company may be in violation
9 of any requirement of the CAA and its implementing regulations. EPA Region 9
10 routinely sends Section 208 information requests to companies subject to the
11 CAA’s requirements.

12
13 13. Manufacturers and sellers of aftermarket defeat devices are subject
14 to the CAA and to Section 208 of the CAA.

15
16 14. On April 24, 2017, EPA Region 9 issued a request for information
17 under Section 208 of the CAA to GBZ (“Information Request”). The Information
18 Request sought information relating to GBZ’s manufacture and sales of
19 aftermarket defeat devices to determine its compliance with the CAA. A true and
20 correct copy of the Information Request is Exhibit A to my declaration.

21
22 15. In its response to EPA’s Information Request and EPA’s follow-up
23 questions related to its responses, GBZ provided product descriptions and
24 information, installation instructions, and sales data for certain products sold
25 between January 1, 2015, and April 24, 2017. GBZ admitted that all of the
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1 exhaust system components sold during this time “enables removal of an emission
2 related part,” identifying 866 block plates that enable the removal of the EGR and
3 129 exhaust replacement pipes that enable the removal of the DPF and/or DOC.
4 *See* Table 1 of Ex. B. Additionally, GBZ admitted that of its EM products (i.e.,
5 tuners) it sold 656 units of the “Dodge 3.0 (GBZ-DD30),” which disables or
6 renders inoperative the DPF, and sold 7,329 tuners that came with “Maintenance
7 Mode” which enables removal of DPF, EGR, and SCR. *See* Table 2 of Ex. B.
8 GBZ identified “Maintenance Mode” as an “Add-On for all OBD Products;”
9 however, the total units GBZ sold of “Maintenance Mode” was the same number
10 of the total units of *all* its tuners sold, creating a reasonable assumption that
11 “Maintenance Mode” was included in all of the tuners GBZ sold. A true and
12 correct copy of EPA’s follow-up questions related to GBZ’s initial response are
13 Exhibit C and Exhibit E to my declaration. A true and correct copy of the
14 documents provided by GBZ in response to our request and follow-up questions
15 are Exhibit B, Exhibit D, and Exhibit F to my declaration.

16 16. Based on the information provided by GBZ in response to EPA’s
17 Information Request, EPA has determined that between January 1, 2015, and April
18 24, 2017, GBZ manufactured and/ or sold at least 8,323 aftermarket defeat
19 devices. GBZ’s defeat device products include: exhaust replacement pipes, EGR
20 block plates, DPF emulators, and tunes contained in handheld tuners. These
21 categories work in different ways with the primary effect of disabling or removing
22

1 emission controls on motor vehicles. EGR block plates defeat emission controls
2 by physically removing or bypassing the EGR system. Exhaust replacement pipes
3 are hardware that replace all or part of the exhaust system with a “straight pipe”
4 that does not contain emission control hardware. DPF Emulators imitate signals to
5 trick the internal diagnostic system in the vehicle, the OBD, from detecting that
6 the DPF filter was removed or otherwise defeated. The tuners contain software
7 (tunes) that function in two ways: enabling the removal of emission control
8 hardware by bypassing software systems that routinely confirm its proper
9 operation, and by modifying Certified Stock Calibrations to change the engine
10 behavior.
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13 17. The use of these products results in a significant increase in NO_x
14 emissions, which contribute to the formation of ozone or ground level ozone. The
15 use of these products also results in a significant increase of PM emissions. Both
16 ozone and PM are known to cause deleterious effects to human health and the
17 environment.
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20 18. EPA also determined that a number of GBZ’s responses to
21 information requests were incomplete and inadequate. For example, GBZ failed
22 to answer questions related to the functionality of “maintenance mode.” In
23 supplemental information requests, EPA requested a description of maintenance
24 mode. GBZ responded by providing the user manual for the EM1.0 programmer
25 instead of a description of “maintenance mode.” A true and correct copy of EPA’s
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1 subsequent request for information related to maintenance mode is Exhibit E to
2 my declaration. A true and correct copy of the documents provided by GBZ in
3 response to our request and follow-up questions is Exhibit F to my declaration.

4 19. All of the defeat device products GBZ manufactures and offers for
5 sale are designed and marketed for use on specific makes and models of Fiat
6 Chrysler Automobiles (“FCA”), General Motors (“GM”), or Ford motor vehicles
7 or engines. All three of these companies sought and obtained COCs from the EPA
8 for these motor vehicles or engines. These certifications unequivocally
9 demonstrate that these vehicles and engines are “motor vehicles” and “motor
10 vehicle engines” under the CAA.

11 20. At all relevant times, each of these products GBZ manufactures,
12 offers for sale, and sells are “defeat devices” with a principle effect of bypassing,
13 defeating, or rendering inoperative emission controls on or in motor vehicles,
14 within the meaning of the CAA. These products are identified in Attachment A -
15 “GBZ Defeat Device Product List.”

16 **C. CAA Section 203 Notice of Violation**

17 21. Although not required under Title II of the CAA, EPA Region 9
18 often issues notices of violation (“NOV”) to notify companies that EPA has found
19 violations of the CAA and provides the company an opportunity to confer with
20 EPA concerning the alleged violations.

21 22. Since I have been with EPA Region 9, I have assisted with the

1 issuance of six aftermarket defeat device NOVs.

2 23. In response to these six NOVs, companies typically requested an
3 opportunity to confer with EPA to discuss the allegations in the NOVs. Such
4 conferences are referred to as NOV conferences.

5
6 24. Typical topics of discussion during NOV conferences include the
7 allegations in the NOV and potential paths towards resolution of the alleged
8 violations.

9
10 25. On December 22, 2017, EPA issued an NOV to GBZ (“GBZ NOV”)
11 alleging the violations of Section 203(a)(3)(B) of the CAA for the manufacture,
12 sale, and offer for sale of three main categories of defeat device products: exhaust
13 replacement pipes, EGR block plates, and tuners. The NOV covers 129 exhaust
14 replacement pipes, 866 EGR block plates, and 656 tuners.

15
16 26. Notably, the 656 tuners addressed in the NOV are products GBZ
17 admitted had delete capabilities, as they were packaged with DPF emulators. GBZ
18 sold at least 6,672 additional tuners that were equipped with Maintenance Mode
19 and were advertised for “temporary DPF maintenance” or use with a “racing
20 exhaust kit.” These tuners were not included in the NOV because GBZ provided
21 EPA with conflicting statements regarding these products’ capabilities. However,
22 during early stages of settlement negotiations EPA informed GBZ that it believes
23 these tuners are defeat devices based on their ability to interfere with OBD
24 systems. Furthermore, the CAA does not require the issuance of an NOV prior to
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1 an enforcement action for violations of Section 203(a)(3)(B),

2 **D. NOV and Potential Settlement Discussions**

3 27. On January 10, 2018, GBZ's counsel, Mathew Barlow of The
4 Barlow Law Firm LLC, held a teleconference with Ryan Bickmore, the lead EPA
5 Region 9 case attorney assigned to this matter, to discuss the allegations in the
6 NOV and to inquire about GBZ's interest in potentially discussing a settlement.
7

8 28. On October 11, 2018, EPA participated in a teleconference with
9 GBZ to discuss potential settlement terms. Present for the teleconference was
10 GBZ's counsel, Jerry Black (GBZ's owner), and representatives from EPA (Rose
11 Galer and Ryan Bickmore). EPA made an offer to settle the matter.
12

13 29. In late October, 2018, GBZ responded to EPA's settlement offer
14 declining to settle the matter.
15

16 30. Gear Box Z has continued to sell products since the issuance of the
17 NOV, including a "Spring Sale" and "Summer Sale" during each season on its
18 website for 20% off of all its products (nearly all of which are defeat devices).
19 This "Summer Sale" promotion was on Gear Box Z's website as recently as
20 August 19, 2020.
21

22 **E. Documents**

23 31. True and correct copies of the following documents that I am
24 personally familiar with are being filed with my Declaration as Exhibits A through
25 G in support of the United States' motion for preliminary injunction:
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- A. April 24, 2017 Letter from Matt Salazar (U.S. EPA) to Jerry Black (Gear Box Z, Inc.) requesting information pursuant to CAA Section 208
- B. June 30, 2017 Letter from Matthew Barlow (Gear Box Z, Inc. Counsel) to Matt Salazar (U.S. EPA) enclosing GBZ response to April 24, 2017 CAA Section 208 Information Request
- C. July 24, 2017 E-mail from Rose Galer to Matthew Barlow requesting additional information about GBZ's responses, specifically regarding "maintenance mode"
- D. August 25, 2017 Letter from Matt Barlow (Gear Box Z, Inc. Counsel) to Rose Galer (U.S. EPA) responding to follow-up CAA Section 208 responses
- E. September 7, 2017 Email from Rose Galer to Matthew Barlow requesting subsequent additional information regarding "maintenance mode"
- F. September 22, 2017 E-mail from Matt Barlow (Gear Box Z, Inc. Counsel) to Rose Galer (U.S. EPA) responding to follow-up CAA Section 208 request for information
- G. December 22, 2017 Notice of Violation issued to Gear Box Z, Inc.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 19, 2020, at Los Angeles, California



Rose Galer

EXHIBIT A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

APR 24 2017

Certified Mail
7016 1370 0000 2235 2081

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

IN THE MATTER OF: GEAR BOX Z, INC.

Gear Box Z, Inc.
55 North Pioneer St. #2246
Colorado City, AZ 86021

ATTENTION: Jerry Black

Request for Information Under § 208(a) of the Clean Air Act, 42 U.S.C. § 7542(a)

The United States Environmental Protection Agency (EPA) hereby requires Gear Box Z, Inc. (Gear Box Z) to submit certain information as part of an EPA investigation to determine Gear Box Z's compliance with Section 203 of the Clean Air Act (CAA), 42 U.S.C. § 7522, and the applicable regulations at 40 C.F.R. Parts 85, 86, 1037, and 1068. Examples of vehicles regulated under these Parts include, but are not limited to, light and heavy-duty trucks. Appendix A provides definitions for some of the terms used in this request, Appendix B provides instructions for your responses to this request, and Appendix C specifies the information that you must submit.

The EPA is issuing this Request for Information under Section 208(a) of the CAA, 42 U.S.C. § 7542(a). Under Section 208(a), the Administrator of the EPA may require any person who is subject to the CAA to provide information necessary to determine whether the person has acted in compliance with these requirements and the regulations promulgated thereunder. The Administrator has delegated this authority to the undersigned Director of the Air Enforcement Division, Office of Enforcement and Compliance Assurance.

You must submit responses to this Request for Information within thirty (30) calendar days from the date you receive this letter. Please carefully review the instructions, definitions, and specific requests as you prepare your response. If you anticipate being unable to fully respond to this Request for Information by this date, you must contact Rose Galer at (415) 947-4289 within 15 days of the date you receive this letter and, with an appropriate justification, request an extension of time to answer some or all of the requests. If timely submitted, the EPA will review your extension request and may extend the time in which your response must be provided.

Failure to provide the required information may result in the initiation of a civil action pursuant to Section 205(b) of the CAA, 42 U.S.C. § 7524(b). Failure to provide all requested information in its

entirety, and in the format requested, may result in additional inquiries and penalties. It is important that your responses be clear, accurate, organized, and complete. We will regard submitted information that is misleading, false, incomplete, or submitted without regard to its accuracy as a violation of the CAA and/or criminal statutes. We may use any information submitted in response to this Request for Information in an administrative, civil, or criminal action.

We would like to take this opportunity to advise you may qualify as a “small business” under the Small Business Regulatory Enforcement and Fairness Act (SBREFA). Please review the enclosed SBREFA Information Sheet, which is designed to provide information on compliance assistance to entities that may qualify as small businesses as well as to inform them of their right to comment to the SBREFA Ombudsman concerning EPA’s enforcement activities. Please be aware that SBREFA does not eliminate Gear Box Z’s responsibility to respond in a timely fashion to any complaint or information request that EPA may issue or other enforcement action that EPA may take, nor does SBREFA create any new rights or defenses under the law other than the right to comment to the SBREFA Ombudsman.

Finally, you must submit all requested information under an authorized signature with the following certification (provided in Appendix D):

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act, 42 U.S.C. § 7413(c)(2), and 18 U.S.C. §§ 1001 and 1341.

You are entitled to assert a business confidentiality claim covering all or part of the information you submit in response to this Request for Information, in accordance with the procedures described in the Confidentiality of Business Information (“CBI”) regulations, 40 C.F.R. Part 2, Subpart B. However, no CBI claim may be made with respect to emissions data as defined at 40 C.F.R. § 2.301(a)(2). You must specify the page, paragraph and sentence when identifying the information subject to your CBI claim. Appendix E of this Request for Information specifies the assertion and substantiation requirements for business confidentiality claims. The EPA may, without further notice, provide the public with any information not subject to a CBI claim.

Please submit all requested information, via electronic mail or express delivery, to:

Matt Salazar, Manager, Air Enforcement Office
Enforcement Division
Attn: Rose Galer, Environmental Protection Specialist
U.S. Environmental Protection Agency, Region IX
75 Hawthorne St. (ENF-2-1)
San Francisco, CA 94105

Any questions concerning this Request for Information should be directed to Rose Galer at 415-947-4289 or Galer.Rose@epa.gov or have your attorney contact Ryan Bickmore in the Office of Regional Counsel at 415-972-3058 or Bickmore.Ryan@epa.gov.



Matt Salazar
Manager, Air Enforcement Office
United States Environmental Protection Agency
Region 9

4.24.2017

Date

Appendix A

Definitions

1. All terms used in this Request for Information will have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 et seq., or the Motor Vehicle Regulations found at 40 C.F.R. Parts 85, 86, 1037, and 1068.
2. The terms “affiliate” or “affiliated” are used to indicate a relationship to a specified person, and mean any person that, directly or indirectly or through one or more intermediaries, owns or controls, is owned or controlled by, or is under common ownership or control with such person (other than entities serving solely as customs brokers).
3. The terms “document” and “documents” means any object that records, stores, or presents information, and includes, without limitation, email, writings, memoranda, contracts, agreements, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy shall also include attachments to or enclosures with any document.
4. The term “electronic control module” or “ECM” means a device that receives inputs from various sensors and outputs signals to control engine, vehicle, or equipment functions. The ECM uses software programming including calculations and tables of information to provide the appropriate outputs. ECM can be a generic term but may refer specifically to the engine control module when discussing emission controls on vehicles and engines. Other ECMs may be incorporated separately with multiple units used to control various engine, vehicle, or equipment functions. Examples of electronic control modules include, but are not limited to, Engine Control Module, OBD Control Modules, Powertrain Control Module (PCM), Transmission Control Module (TCM), Body Control Module (BCM) and after treatment control module. Any or all of these modules may be combined into a single unit.
5. The term “Emission Related Parts” means those parts installed for the specific purpose of controlling emissions or those components, systems, or elements of design which must function properly to assure continued vehicle emission compliance as defined in 40 C.F.R. § 85.2102 (including but not limited to a catalytic converter, a turbocharger, an exhaust gas recirculation, a diesel particulate filter, a secondary catalytic reactor, a fuel injector, a selective catalytic reduction, onboard diagnostics, and electronic control).

6. The term “exhaust gas recirculation” or “EGR” includes systems which redirect, usually by use of an EGR valve, a portion of engine exhaust back into the engine’s combustion chamber to cool and reduce peak combustion temperatures and pressures, thereby reducing the production of nitrogen oxide (NO_x). The EGR system may include an EGR cooler to cool the recirculated exhaust to further reduce the combustion temperature.
7. The term “onboard diagnostics” or “OBD” includes systems which monitor components that can affect the emission performance of the vehicle to ensure that the vehicle remains as clean as possible over its entire life, and assists repair technicians in diagnosing and fixing problems with the computerized engine controls. If a problem is detected, the OBD system illuminates a warning lamp on the vehicle instrument panel to alert the driver.
8. The term “person” includes an individual, corporation, partnership, limited liability company, sole proprietorship, joint venture, or any formal or informal entity, organization or association.
9. The term “selective catalytic reduction” or “SCR” includes systems which inject a reductant, such as diesel exhaust fluid (DEF), into the exhaust stream where it reacts with a catalyst to convert NO_x to nitrogen gas (N_2) and water (H_2O).
10. The terms “you”, “your”, and “Gear Box Z” includes Gear Box Z, Inc. and any affiliates, predecessors, successors, and assigns.

Appendix C

Request for Information

Gear Box Z must submit the following information to the United States Environmental Protection Agency pursuant to Section 208 of the CAA, 42 U.S.C. § 7542, regarding the sale or offering for sale of certain parts and products.

1. The enclosed Table 1 identifies each exhaust system or exhaust system component (collectively “component”) currently offered for sale on Gear Box Z’s website at www.gearboxz.com. Please complete the table by filling in the missing information. Specifically, as shown in the table, for each component Gear Box Z must:
 - Indicate whether the component enables removal of an Emission Related Part (e.g., by removing the DPF or SCR or bypassing the EGR);
 - If so, identify which Emission Related Part(s) (e.g., DPF, SCR, EGR);
 - Identify the quantity that was sold by Gear Box Z to consumers with shipping addresses in the United States from January 1, 2015 through the date of this letter; and
 - Identify the quantity that was sold by Gear Box Z to wholesalers, distributors, or authorized dealers from January 1, 2015 through the date of this letter.
2. For each component identified in Table 1, provide the following:
 - a. Indicate the vehicle applications by make, model, and year.
 - b. Describe the function of the component and identify whether and how the component enables removal of an Emission Related Part.
 - c. Provide copies of the technical specifications, installation and operating instructions, and warranty information.
 - d. Indicate whether the component is described by Gear Box Z in any documentation, marketing materials, advertisements, websites, or other media with the following statement or similar language:
 - “Legal for racing vehicles only which may never be used on a highway”
 - “Never to be used on a highway”

- “Off-highway racing use only”
- “Off-road use only”
- “Race use only”
- “Not for sale in California”
- “Not legal in the state of California”

Provide references to all materials containing such statements.

- e. If Gear Box Z has recommended that the component be used for testing, maintenance, racing, or off-road only, describe the mechanisms, if any, that Gear Box Z has implemented to ensure that the component is only used for such purposes.
 - f. Provide copies of receipts for the total quantity of each component sold by Gear Box Z to consumers with shipping addresses in the United States during since January 1, 2015 through the date of this letter.
 - g. Provide copies of invoices or receipts for each component sold by Gear Box Z to all wholesalers, distributors, or authorized dealers during from January 1, 2015 through the date of this letter.
 - h. Identify the name, address, contact person, and phone number of each wholesaler, distributor, and authorized dealer for which Gear Box Z provides an invoice or receipt in response to Question 2.g. For each entity identified, also identify the brand name under which each component is or has been marketed.
3. Provide the name and address of each location where any of the components identified in Table 1 have been or currently are being stored or offered for sale by Gear Box Z.
 4. Indicate whether, since January 1, 2015, Gear Box Z has sold or offer for sale any exhaust system or exhaust system component not identified in Table 1. If so, provide a list of each component and indicate whether the component removes or enables removal of an Emission Related Part.
 5. The enclosed Table 2 identifies each programmer, module, tuner, ECM calibration tool, flash tool, or engine management products (collectively “EM products”) currently offered for sale on Gear Box Z’s website at www.gearboxz.com. Please complete the table by filling in the missing information. Specifically, as shown in the table, for each EM product Gear Box Z must:
 - Indicate whether the EM product: (1) disables or renders inoperative an Emission Related Part, or (2) reads, clears, or prevents the occurrence of vehicle diagnostic

trouble codes, or uses any other means to interfere with the proper functioning of the vehicle's OBD system to detect and report a malfunctioning, non-functioning, or missing Emission Related Part;

- If so, identify which Emission Related Part(s) the EM product affects (e.g., DPF, SCR, EGR);
- Identify the quantity that was sold by Gear Box Z to consumers with shipping addresses in the United States from January 1, 2015 through the date of this letter; and
- Identify the quantity that was sold by Gear Box Z to wholesalers, distributors, or authorized dealers from January 1, 2015 through the date of this letter.

6. For each EM product identified in Table 2:

- a. Indicate the vehicle applications by make, model, and year.
- b. Describe what the EM product does and how it functions or operates, including how the EM product bypasses Emission Related Parts or facilitates the operation of the vehicle with an Emission Related Part missing.
- c. Indicate whether the EM product is capable of bypassing or rendering inoperative any Emission Related Part without the use of additional equipment (e.g., the exhaust components identified in Table 1).
- d. Provide copies of the technical specifications, installation and operating instructions, and warranty information.
- e. Provide digital copies of all tune files (stock or custom) made available or installed through your tuning instruments or devices in a format which is readable without proprietary software. If there is no format which exists without use of such software – please provide the software needed.
- f. Provide a narrative explanation for the intended application for all tune files provided in response to Question 6.e.
- g. Describe the purpose and function of the following “add-ons” or “modes” offered by Gear Box Z:
 - Maintenance Mode or DPF-R

- Plus Tune
- Tachyon Tune
- Gauges and Monitoring System

h. Indicate whether the component is described by Gear Box Z in any documentation, marketing materials, advertisements, websites, or other media with the following statement or similar language:

- “Legal for off-road or racing use only.”

Provide references to all materials containing such statements.

- i. If Gear Box Z has recommended that the EM product be used for testing, maintenance, racing, or off-road only, describe the mechanisms, if any, that Gear Box Z has implemented to ensure that the EM product is only used for such purposes.
 - j. Provide copies of receipts for each EM product sold by Gear Box Z to consumers with shipping addresses in the United States during since January 1, 2015 through the date of this letter.
 - k. Provide copies of invoices or receipts for each EM product sold by Gear Box Z to all wholesalers, distributors, or authorized dealers during from January 1, 2015 through the date of this letter.
 - l. Identify the name, address, contact person, and phone number of each wholesaler, distributor, and authorized dealer for which Gear Box Z provides an invoice or receipt in response to Question 6.k. For each entity identified, also identify the brand name under which each component is or has been marketed.
7. Provide the name and address of each location where any of the EM products identified in Table 2 have been or currently are being stored or offered for sale by Gear Box Z.
8. Indicate whether, since January 1, 2015, Gear Box Z has sold or offered for sale any EM products not identified in Table 2. If so, provide a list of each product and indicate whether the EM product (1) disables or renders inoperative an Emission Related Part, or (2) reads, clears, or prevents the occurrence of vehicle diagnostic trouble codes, or uses any other means to interfere with the proper functioning of the vehicle's OBD system to detect and report a malfunctioning, non-functioning, or missing Emission Related Part.
9. Provide a list of all persons (as defined in Appendix A) that are affiliated with Gear Box Z. Describe the business relationships with these persons.

10. Provide a copy of your articles of incorporation and by-laws.
11. Identify your current net worth and annual revenue for the past calendar or fiscal year.
12. Identify each person responsible for responding to this Request for Information, including their title, and the request(s) to which they responded.

EXHIBIT B



HC 65 Box 537
3285 S. Hwy 389, #101
Fredonia, AZ 86022
(602) 461-8863
matt@barlowlawgroup.com

June 30, 2107

VIA CERTIFIED MAIL

Matt Salazar, Manager, Air Enforcement Office
Enforcement Division
Attn: Rose Galer, Environmental Protection Specialist
U.S. Environmental Protection Agency, Region IX
75 Hawthorne St. (ENF-2-1)
San Francisco, CA 94105

**Re: IN THE MATTER OF GEAR BOX Z, INC.
Response to Request for Information.**

Rose Galer:

Please see the following responses to each question:

1. The enclosed Table 1 identifies each exhaust system or exhaust system component (collectively "component") currently offered for sale on Gear Box Z's website at www.gearboxz.com. Please complete the table by filling in the missing information. Specifically, as shown in the table, for each component Gear Box Z must:
 - Indicate whether the component enables removal of an Emission Related Part (e.g., by removing the DPF or SCR or bypassing the EFR);
 - If so, identify which Emission Related Part(s) (e.g., DFT, SCR, EGR);
 - Identify the quantity that was sold by Gear Box Z to consumers with shipping addresses in the United States from January 1, 2015 through the date of this letter; and
 - Identify the quantity that was sold by Gear Box Z to wholesalers, distributors, or authorized dealers from January 1, 2015 through the date of this letter.

RESPONSE: See attachment marked "Table 1 Response."

2. For each component identified in the Table 1, provide the following:

- a. Indicate the vehicle applications by make, model, and year.

RESPONSE: See attachment marked "Product Information."

- b. Describe the function of the component and identify whether and how the component enables removal of an Emission Related Part.

RESPONSE: See attachment marked "Product Information."

- c. Provide copies of the technical specifications, installation and operating instructions, and warranty information.

RESPONSE: See attachment marked "Installation Instructions."

- d. Indicate whether the component is described by Gear Box Z in any documentation, marketing materials, advertisements, websites, or other media with the following statement or similar language:

- "Legal for racing vehicles only which may never be used on a highway"
- "Never to be used on a highway"
- "Off-highway racing use only"
- "Off-road use only"
- "Race use only"
- "Not for sale in California"
- "Not legal in the state of California"

Provide references to all materials containing such statements.

RESPONSE: See attachments marked "Product Information and Installation Instructions."

- e. If Gear Box Z has recommended that the component be used for testing, maintenance, racing, or off-road only, describe the mechanisms, if any, that Gear Box Z has implemented to ensure that the component is only used for such purposes.

RESPONSE: See attachments marked "Product Information and Installation Instructions."

- f. Provide copies of receipts for the total quantity of each component sold by Gear Box Z to consumers with shipping addresses in the United States during since January 1, 2015 through the date of this letter.

RESPONSE: Gear Box Z sells each component online and does not maintain nor generate tangible copies of receipts with customer information. All sales to customers are

online customers with United States shipping addresses.

- g. Provide copies of invoices or receipts for each component sold by Gear Box Z to all wholesalers, distributors, or authorized dealers from January 1, 2015 through the date of this letter.

RESPONSE: Gear Box Z is unable to respond to this request. Gear Box Z does not categorize its customers into wholesalers, distributors or authorized dealers.

- h. Identify the name, address, contact person, and phone number of each wholesaler, distributor, and authorized dealer for which Gear Box Z provides an invoice or receipt in response to Question 2.g. For each entity identified, also identify the brand name under which each component is or has been marketed.

RESPONSE: See response to Question 2.g. The response to the second portion of Question H, please see attachment marked "Product Information."

3. Provide the name and address of each location where any of the components identified in Table 1 have been or currently are being stored or offered for sale by Gear Box Z.

RESPONSE: Gear Box Z, Inc.
55 North Pioneer St. #2246
Colorado City, AZ 86021

4. Indicate whether, since January 1, 2015, Gear Box Z has sold or offer for sale any exhaust system or exhaust system component not identified in Table 1. If so, provide a list of each component and indicate whether the component removes or enables removal of an Emission Related Part.

RESPONSE: Gear Box Z has not sold nor has offered to sell any exhaust system or exhaust system component not identified in Table 1.

5. The enclosed Table 2 identifies each programmer, module, tuner, ECM, calibration tool, flash tool, or engine management products (collectively "EM products") currently offered for sale on Gear Box Z's website at www.gearboxz.com. Please complete the table by filling in the missing information. Specifically, as shown in the table, for each EM product Gear Box Z must:

- Indicate whether the EM product: (1) disables or renders inoperative an Emission Related Part, or (2) reads, clears, or prevents the occurrence of vehicle diagnostic trouble codes, or uses any other means to interfere with the proper functioning of the vehicle's OBD system to detect and report a malfunctioning, non-functioning, or missing Emission Related Part;
- If so, identify which Emission Related Part(s) the EM product affects (e.g., DPF, SCR, EGR);

- Identify the quantity that was sold by Gear Box Z to consumers with shipping addresses in the United States from January 1, 2015 through the date of this letter; and
- Identify the quantity that was sold by Gear Box Z to wholesalers, distributors, or authorized dealers from January 1, 2015 through the date of this letter.

RESPONSE: See attachment marked “Table 2 Response.”

6. For each EM product identified in Table 2:

- a. Indicate the vehicle applications by make, model, and year.

RESPONSE: See attachment marked “Product Information.”

- b. Describe what the EM product does and how it functions or operates, including how the EM product bypasses Emission Related Parts or facilitates the operations of the vehicle with an Emission Related Part missing.

RESPONSE: See attachments marked “Product Information and Installation Instructions.”

- c. Indicate whether the EM product is capable of bypassing or rendering inoperative any Emission Related Part without the use of additional equipment (e.g., the exhaust components identified in Table 1).

RESPONSE: EM products are not capable of bypassing or rendering inoperative any Emission Related Part without the use of additional equipment

- d. Provide copies of the technical specifications, installation and operating instructions, and warranty information.

RESPONSE: See attachment marked “Installation Instructions.”

- e. Provide digital copies of all tune files (stock or custom) made available or installed through your tuning instruments or devices in a format which is readable without proprietary software. If there is no format which exists without use of such software—please provide the software needed.

RESPONSE: Gear Box Z is unable to respond to this request for several reasons. First, the question is drafted in such a way that it does not convey exactly what information is being requested. Second, if Gear Box Z is required to answer this request, it calls for the production of tune files that are within the possession, custody and control of third parties.

- f. Provide a narrative explanation for the intended application for all tune files provided

in response to Question 6.e.

RESPONSE: Gear Box Z is unable to respond to this request. Please see response to Question 6.e.

g. Describe the purpose and function of the following “add-ons” or “modes” offered by Gear Box Z:

- Maintenance Mode or DPF-R
- Plus Tune
- Tachyon Tune
- Gauges and Monitoring System

RESPONSE: See attachments marked “Product Information and Installation Instructions.”

h. Indicate whether the component is described by Gear Box Z in any documentation, marketing materials, advertisements, websites, or other media with the following statement or similar language:

- “Legal for off-road or racing use only.”

Provide references to all materials containing such statement.

RESPONSE: See attachments marked “Product Information and Installation Instructions.”

i. If Gear Box Z has recommended that the EM product be used for testing, maintenance, racing, or off-road only, describe the mechanisms, if any, that Gear Box Z has implemented to ensure that the EM product is only used for such purposes.

RESPONSE: See attachments marked “Product Information and Installation Instructions.”

j. Provide copies of receipts for each EM product sold by Gear Box Z to consumers with shipping addresses in the United States during since January 1, 2015 through the date of this letter.

RESPONSE: Gear Box Z sells each EM product online and does not maintain nor generate tangible copies of receipts with customer information. All sales to customers are online customers with United States shipping addresses.

k. Provide copies of invoices or receipts for each EM product sold by Gear Box Z to all wholesalers, distributors, or authorized dealers during from January 1, 2015 through the date of this letter.

RESPONSE: Gear Box Z is unable to respond to this request. Gear Box Z does not

categorize its customers into wholesalers, distributors or authorized dealers.

1. Identify the name, address, contact person, and phone number of each wholesaler, distributor, and authorized dealer for which Gear Box Z provides an invoice or receipt in response to Question 6.k. For each entity identified, also identify the brand name under which each component is or has been marketed.

RESPONSE: See response to Question 6.k. The response to the second portion of Question H, please see attachment marked "Product Information."

7. Provide the name and address of each location where any of the EM products identified in Table 2 have been or currently are being stored or offered for sale by Gear Box Z.

RESPONSE: Gear Box Z, Inc.
55 North Pioneer St. #2246
Colorado City, AZ 86021

8. Indicate whether, since January 1, 2015, Gear Box Z has sold or offered for sale any EM products not identified in Table 2. If so, provide a list of each product and indicate whether the EM product (1) disables or renders inoperative an Emission Related Part, or (2) reads, clears, or prevents the occurrence of vehicle diagnostic trouble codes, or uses any other means to interfere with the proper functioning of the vehicle's OBD system to detect and report a malfunctioning, non-functioning, or missing Emission Related Part.

RESPONSE: Gear Box Z has not sold nor has offered to sell any EM product not identified in Table 2.

9. Provide a list of all persons (as defined in Appendix A) that are affiliated with Gear Box Z. Describe the business relationships with these persons.

RESPONSE: See attachment marked "Articles of Incorporation."

10. Provide a copy of your articles of incorporation and by-laws.

RESPONSE: See attachment marked "Articles of Incorporation."

11. Identify your current net worth and annual revenue for the past calendar or fiscal year.

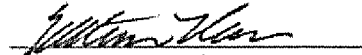
RESPONSE: 2016 Net Worth: \$187,059; 2016 Revenue: \$2,028,295.

12. Identify each person responsible for responding to this Request for Information, including their title, and the request(s) to which they responded.

RESPONSE: Jerry Black, President.

Please let me know if you need anything else to assist you in your Request For Information. You may contact me by the email provided above.

Respectfully,

A handwritten signature in black ink, appearing to read "Matthew I. Barlow", is written over a horizontal line.

Matthew I. Barlow,
The Barlow Law Firm, LLC

cc: Ryan Bickmore

Statement of Certification

You are submitting the enclosed documents in response to the U.S. Environmental Protection Agency's ("EPA") Request for Information, issued pursuant to Section 208(a) of the Clean Air Act, to determine compliance with the Clean Air Act and its affiliated regulations.

I certify that I am fully authorized by Gear Box Z, Inc., to provide the above information on its behalf to the EPA.

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act, 42 U.S.C. § 7413(c)(2), and 18 U.S.C. §§ 1001 and 1341.

Date: 06/30/17
Name (Printed): Jerry Black
Signature: Jerry Black
Title: President

TABLE 1

RESPONSE

Table I

Exhaust Component	Does the component enable removal of an Emission Related Part (e.g. DPF, SCR, EGR)?	If So, which Emission Related Part(s) (e.g. DPF, CAT, EGR)?	No. of units sold to consumers with shipping addresses in the U.S. since January 1, 2015	No. of units sold to wholesalers, distributors, or authorized dealers since January 1, 2015
AFE 4" Down-Pipe Back CAT/DPF Delete Race Exhaust for Ford Trucks (AFEDP4F)	Y	CAT/DPF	8	0
AFE 4" Down-Pipe Back CAT/DPF Delete Race Exhaust for GM Trucks (AFEGMP4F)	Y	CAT/DPF	2	0
AFE 4" Turbo Back DPF Delete Race Exhaust for Dodge Trucks (AFEDP4F)	Y	DPF	1	0
AFE CAB & Chassis DPF Delete Race Exhaust for Dodge Trucks (AFEDPCC)	Y	DPF	1	0
AFE CAT/DPF Delete Race Exhaust for Dodge Trucks (AFEDP2)	Y	CAT/DPF	1	0
AFE CAT/DPF Delete Race Exhaust for Ford Trucks (AFEDP2)	Y	CAT/DPF	36	0
AFE DPF Delete Race Exhaust for Dodge Trucks (AFEDP)	Y	DPF	4	0
AFE DPF Delete Race Exhaust for Ford Trucks (AFEDP)	Y	DPF	74	0
AFE DPF Delete Race Exhaust for GM Trucks Crew Cab Long Box (AFEGMP-CCLB)	Y	DPF	0	0
AFE DPF Delete Race Exhaust for GM Trucks Crew Cab Short Bed (AFEGMP-CCSB)	Y	DPF	1	0
AFE DPF Delete Race Exhaust for GM Trucks Extended Cab Short Box (AFEGMP-ECSB)	Y	DPF	1	0
DPF-R Ford EGR Plates (GBZ-FBP)	Y	EGR	143	723

TABLE 2

RESPONSE

Table 2

EM Product	Does the EM Product: (1) disable or render inoperative an Emission Related Part, or (2) prevent diagnostic trouble codes or interfere with the vehicle OBD system's ability to detect non-functioning or missing Emission Related Parts?	If So, which Emission Related Part(s) does the EM product affect (e.g. DPF, CAT, EGR)?	No. of units sold to consumers with shipping addresses in the U.S. since January 1, 2015	No. of units sold to U.S. wholesalers, distributors, or authorized dealers since January 1, 2015
ELECTRON - MULTI-FUNCTION PERFORMANCE GAUGES (GBZ-EM1.0)	N	N/A	7	66
Ford 4.0 Programmer (GBZ-FD40)	N	N/A	229	3146
Ford 4.0 Programmer Plus (GBZ-FED40)	N	N/A	134	2052
Duramax 4.0 Programmer (GBZ-GMD40)	N	N/A	45	630
Duramax 4.0 Programmer w/ Plus (GBZ-GMED40)	N	N/A	25	338
Dodge 3.0(GBZ-DD30)	Y	DPF	52	604
Electron - Ford 2008-2010 6.4L Power Stroke (GBZ-EM1.0)	N	N/A	*included in above totals	*included in above totals
Electron - GM 2007.5-2010 LLM Duramax (GMZ-EM1.0)				
Electron - Ford 2011-2017 6.7L Power Stroke (GBZ-EM1.0)	N	N/A	*included in above totals	*included in above totals
Electron - GM 2011-2017 LML Duramax (GBZ-EM1.0)	N	N/A	*included in above totals	*included in above totals
Maintenance Mode**	Y	DPF/EGR/SCR	493	6836

Add-On for all OBD Products

**See Maintenance Mode
Description sheet

INSTALLATION INSTRUCTIONS

DODGE

DPF-R 3.0 INSTALLATION INSTRUCTIONS



Plug the module into the diagnostic port. The diagnostic port is under the dash, below and to the left of the steering column. Secure the device up under the dash where it will not be in the way. Attach dpf emulator and pressure sensor emulators

IMPORTANT: Wait at least 15 seconds after key is on before starting engine.

Function light will flash quick when it is communicating, then will flash slowly when it is done.

IMPORTANT: If you are using a chip programmer, or when the vehicle is taken to a repair center, it is recommended that you first unplug the DPF-R module.

EXHAUST NOTES: If you are doing your own exhaust mod, it is important to place all sensors (except dpf pressure) back into the exhaust. Reference the stock pipe for location.



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DISCLAIMER OF LIABILITY

THIS IS A HIGH PERFORMANCE PRODUCT. USE AT YOUR OWN RISK. Do not use this Product until you (the "Buyer") have carefully read this Disclaimer. The installation of this Product indicates that you have read and understand, and accept all of the terms of, this Disclaimer.

- Gear Box Z Inc., their affiliates, distributors, dealers, et al. (hereafter referred to as the "Seller") shall not be responsible for the Product's proper installation, use and service. Rather, the Buyer shall look solely to the installer who installs the Product for any service and support needed by the Buyer with respect thereto, as well as any damage that may be done to vehicle components as a result of modifications made by the installer.

- The Buyer is responsible to fully understand the capability and limitations of his/her vehicle according to manufacturer specifications, warnings and instructions and agrees to hold the Seller harmless from any damage resulting from failure to adhere to such specifications, warnings and/or instructions. The Buyer is also responsible to obey all applicable federal, state, and local laws, statutes, and ordinances when operating his/her vehicle, and the Buyer agrees to hold Seller harmless from any violation thereof.

- The Seller's Limited Warranty for this Product is the Buyer's exclusive warranty and is in lieu of all other warranties, express or implied, except as may be required by applicable law. Without limiting the generality of the foregoing, the Seller shall not be liable for any breach of any other written or oral warranties given to the Buyer by any third party(ies) such as those (if any) given to the Buyer by dealers or distributors of the Product.

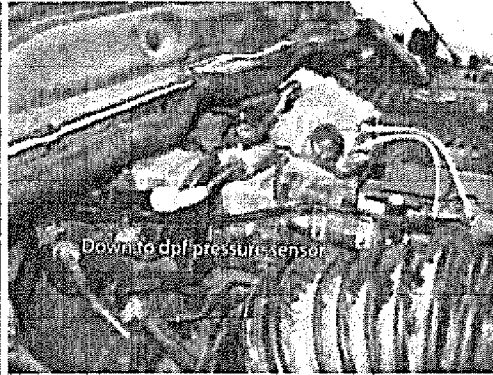
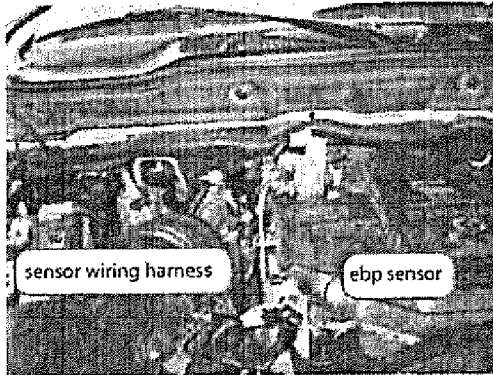
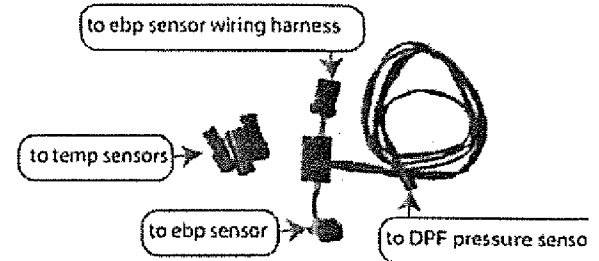
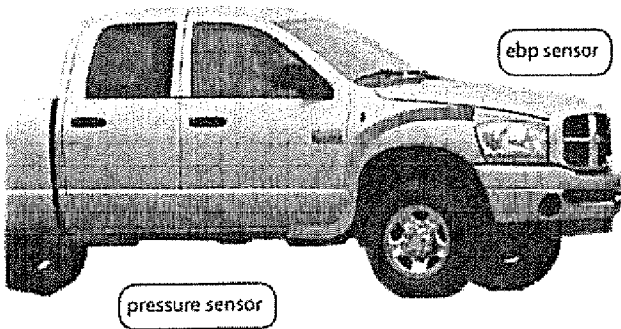
- Consult your vehicle warranty before using this Product. Under no circumstances will the Seller be liable for the voidance of the Buyer's vehicle warranty. Rather, the Buyer assumes all risk and responsibility if an automotive manufacturer and/or dealer void the Buyer's vehicle warranty due to use of this Product.

- This product modifies the programming on the truck's computer. **WARNING:** If the download fails for any reason the truck may be rendered unusable until a recovery can be done on the ECU. BY USING THIS PRODUCT YOU AGREE THAT YOU UNDERSTAND AND TAKE RESPONSIBILITY FOR THIS RISK.

- Operate your vehicle at all times in a safe manner. Regardless of any capability, feature or function of the Seller's Products, the Buyer understands and acknowledges that it is the Buyer's sole responsibility to ensure that (A) the motor vehicle is operated in a safe and legal manner, (B) the motor vehicle is not driven faster than the lower of the speed limit or the speed rating of the tires on the vehicle in which the Seller's product is installed, and (C) the maximum RPM or speed rating of the engine is not exceeded while operating the motor vehicle. In no case will the Seller be held liable, and the Buyer assumes all risk and responsibility, for any property damage, personal injury and/or death that may occur in the event the Buyer operates the vehicle in an unsafe manner, violates the law or exceeds the above mentioned limits. Please check your local, state and federal laws to determine if you are within your rights to modify your vehicle's exhaust. The Seller makes no representation or warranty, express or implied that the use of its Products will comply with local, state, or Federal emission levels, noise levels or safety standards. The Buyer assumes all responsibility for such use and compliance. **SELLER IS NOT LIABLE FOR AND HEREBY EXCLUDES ANY AND ALL INDIRECT, INCIDENTAL, SPECIAL OR CONSEQUENTIAL DAMAGES RELATING TO THE PRODUCTS COVERED BY THIS DISCLAIMER.** The Seller's Limited Warranty for this Product gives you specific legal rights, and you may also have other rights which may vary from state to state. Pertinent state law shall control for what Period of time following the sale a consumer may seek a remedy under the implied warranty of merchantability or fitness for a particular purpose. Some states do not allow the exclusion or limitation of incidental or consequential damages so the above limitations or exclusions may not apply to you.

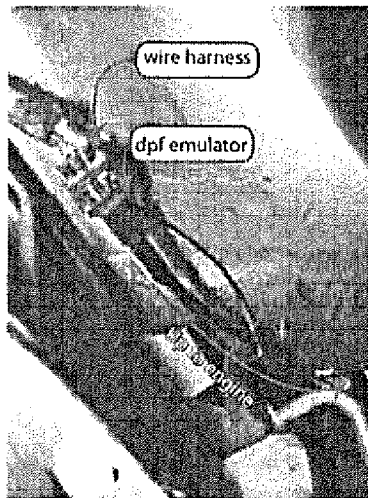
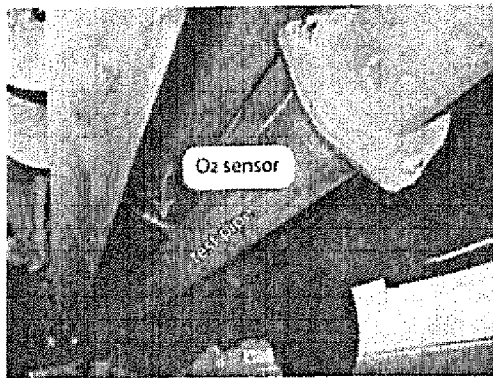
IN THE EVENT THAT THE BUYER DOES NOT AGREE WITH THIS DISCLAIMER, THE BUYER MAY PROMPTLY RETURN THIS PRODUCT, IN A NEW AND UNUSED CONDITION, WITH A DATED PROOF OF PURCHASE, TO THE PLACE OF PURCHASE WITHIN FOURTEEN (14) DAYS FROM DATE OF PURCHASE FOR A FULL REFUND.

DPF Emulator Installation



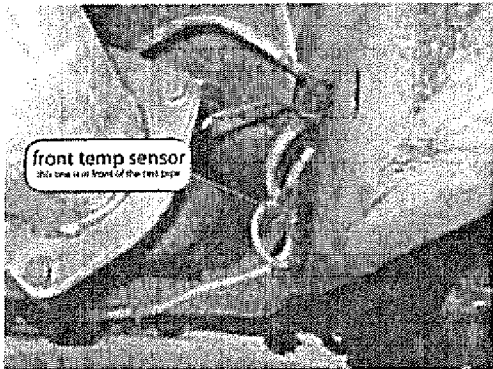
1) Install onto ebp sensor. The two short cables connect in line between the trucks connectors. Plug the female end into the sensor, and the male end into the wiring harness.

2) Route the long cable down to DPF pressure sensor. Run the cable back then down along the dip stick, and then rearward to the DPF sensor.



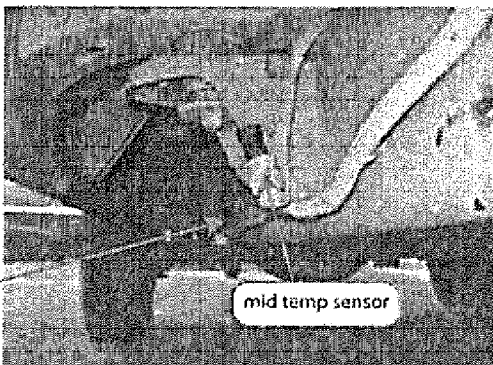
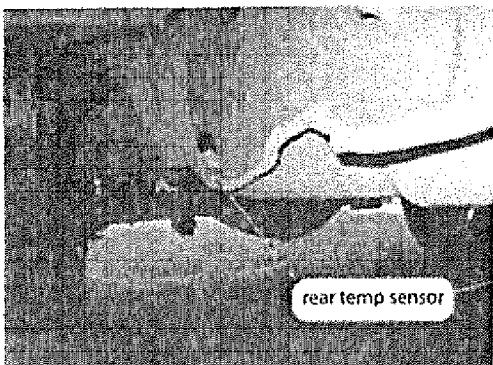
3) Install onto pressure sensor. Unplug pressure sensor & plug cable in place of pressure sensor.

4) Secure any loose or sagging cable with clips or zip ties as needed.



5) Clip the temp sensor emulators onto the temp sensor wiring harnesses. The front temp sensor is in front of the test pipe. Unplug the front temp sensor and plug in a temp sensor emulator.

Optional: use the included heat shrink on the oem sensor plug to keep it clean in case you return the truck back to stock in the future.



WWW.DPF-R.COM

FORD

DPF-R 4.0 INSTALLATIONS

INSTRUCTIONS



Plug the module into the diagnostic port. The diagnostic port is under the dash, below and to the left of the steering column.

The device will power up automatically.

Follow the voice prompts. Navigate the menu with the "YES" and "NO" buttons.

Power/function (green) light will flash when it is communicating.

Warning (red) light will be on while writing to the ECU. DO NOT UNPLUG WHILE THE RED LIGHT IS ON

If you are using with a chip/programmer it is recommended that you install the DPF-R first.

EXHAUST NOTES: Exhaust sensors need to be connected to the truck wiring harness. Exhaust sensors do not need to go back into the pipe.

DPF-R 4.0 DISCLAIMER

THIS IS A HIGH PERFORMANCE PRODUCT. USE AT YOUR OWN RISK. Do not use this Product until you (the "Buyer") have carefully read this Disclaimer. The installation of this Product indicates that you have read and understand, and accept all of the terms of, this Disclaimer.

•Gear Box Z Inc., their affiliates, distributors, dealers, et al. (hereafter referred to as the "Seller") shall not be responsible for the Product's proper installation, use

and service. Rather, the Buyer shall look solely to the installer who installs the Product for any service and support needed by the Buyer with respect thereto, as well as any damage that may be done to vehicle components as a result of modifications made by the installer.

• The Buyer is responsible to fully understand the capability and limitations of his/her vehicle according to manufacturer specifications, warnings and instructions and agrees to hold the Seller harmless from any damage resulting from failure to adhere to such specifications, warnings and/or instructions. The Buyer is also responsible to obey all applicable federal, state, and local laws, statutes, and ordinances when operating his/her vehicle, and the Buyer agrees to hold Seller harmless from any violation thereof.

• The Sellers Limited Warranty for this Product is the Buyers exclusive warranty and is in lieu of all other warranties, express or implied, except as may be required by applicable law. Without limiting the generality of the foregoing, the Seller shall not be liable for any breach of any other written or oral warranties given to the Buyer by any third party(ies) such as those (if any) given to the Buyer by dealers or distributors of the Product.

• Consult your vehicle warranty before using this Product. Under no circumstances will the Seller be liable for the voidance of the Buyer's vehicle warranty. Rather, the Buyer assumes all risk and responsibility if an automotive manufacturer and/or dealer void the Buyers vehicle warranty due to use of this Product.

• This product modifies the programming on the trucks computer. **WARNING:** If the download fails for any reason the truck may be rendered unusable until a recovery can be done on the ECU. BY USING THIS PRODUCT YOU AGREE THAT YOU UNDERSTAND AND TAKE RESPONSIBILITY FOR THIS RISK.

• Operate your vehicle at all times in a safe manner. Regardless of any capability, feature or function of the Seller's Products, the Buyer understands and acknowledges that it is the Buyer's sole responsibility to ensure that (A) the motor vehicle is operated in a safe and legal manner, (B) the motor vehicle is not driven faster than the lower of the speed limit or the speed rating of the tires on the vehicle in which the Seller's product is installed, and (C) the maximum RPM or speed rating of the engine is not exceeded while operating the motor vehicle. In no case will the Seller be held liable, and the Buyer assumes all risk and responsibility, for any property damage, personal injury and/or death that may occur in the event the Buyer operates the vehicle in an unsafe manner, violates the law or exceeds the above mentioned limits. Please check your local, state and federal laws to determine if you are within your rights to modify your vehicle's exhaust. The Seller makes no representation or warranty, express or implied that the use of its Products will comply with local, state, or Federal emission levels, noise levels or safety standards. The Buyer assumes all responsibility for such use and compliance.

SELLER IS NOT LIABLE FOR AND HEREBY EXCLUDES ANY AND ALL INDIRECT, INCIDENTAL, SPECIAL OR CONSEQUENTIAL DAMAGES RELATING TO THE PRODUCTS COVERED BY THIS DISCLAIMER. The Seller's Limited Warranty for this Product gives you specific legal rights, and you may also have other rights which may vary from state to state. Pertinent state law shall control for what Period of time following the sale a consumer may seek a remedy under the implied warranty of merchantability or fitness for a particular purpose. Some states do not allow the exclusion or limitation of incidental or consequential damages so the above limitations or exclusions may not apply to you.

IN THE EVENT THAT THE BUYER DOES NOT AGREE WITH THIS DISCLAIMER, THE BUYER MAY PROMPTLY RETURN THIS PRODUCT, IN A NEW AND UNUSED CONDITION, WITH A DATED PROOF OF PURCHASE, TO THE PLACE OF PURCHASE WITHIN FOURTEEN (14) DAYS FROM DATE OF PURCHASE FOR A FULL REFUND.

EMERGENCY RECOVERY DISCLAIMER

The Special Recovery function of this product is intended only as an emergency use in case something goes wrong during programming of the ECU (ie power failure, accidental unplugging of the programmer, etc.) This function should only be used as a last resort. This function should not be used to recover or troubleshoot another truck. This function is not guaranteed to work, and may not apply the same

firm ware as was originally on the truck. The Special Recovery function of this product is not intended to be used to troubleshoot or diagnose problems. Under no circumstances will the Seller be liable for any damages or expenses incurred by reason of the use of this product. **USE OF THE SPECIAL RECOVERY FUNCTION OF THIS PRODUCT INDICATES THE USER UNDERSTANDS AND AGREES WITH THIS EMERGENCY RECOVERY DISCLAIMER AND THE DPF-R 4.0 DISCLAIMER.**



DPF-R 4.0 DIAGNOSTICS INSTRUCTIONS

THIS FUNCTION IS FOR THE CONVENIENCE OF THE OWNER AND IS NOT INTENDED TO TAKE THE PLACE OF A QUALIFIED TECHNICIAN.

Plug the module into the diagnostic port. The diagnostic port is under the dash, below and to the left of the steering column.

The device will power up automatically.

Follow the voice prompts. Navigate the menu with the "YES" and "NO" buttons.

Navigate to "Diagnostics and emergency recovery" menu.

Press "YES" when asked if you would like to read diagnostic codes. When the product is finished reading codes it will ask if you want to read them again. Press "NO" to move on to the code clearing menu.

Press "YES" or "NO" to clear or leave trouble codes.

Press "NO" to skip the emergency recovery and you will be prompted to unplug the device.

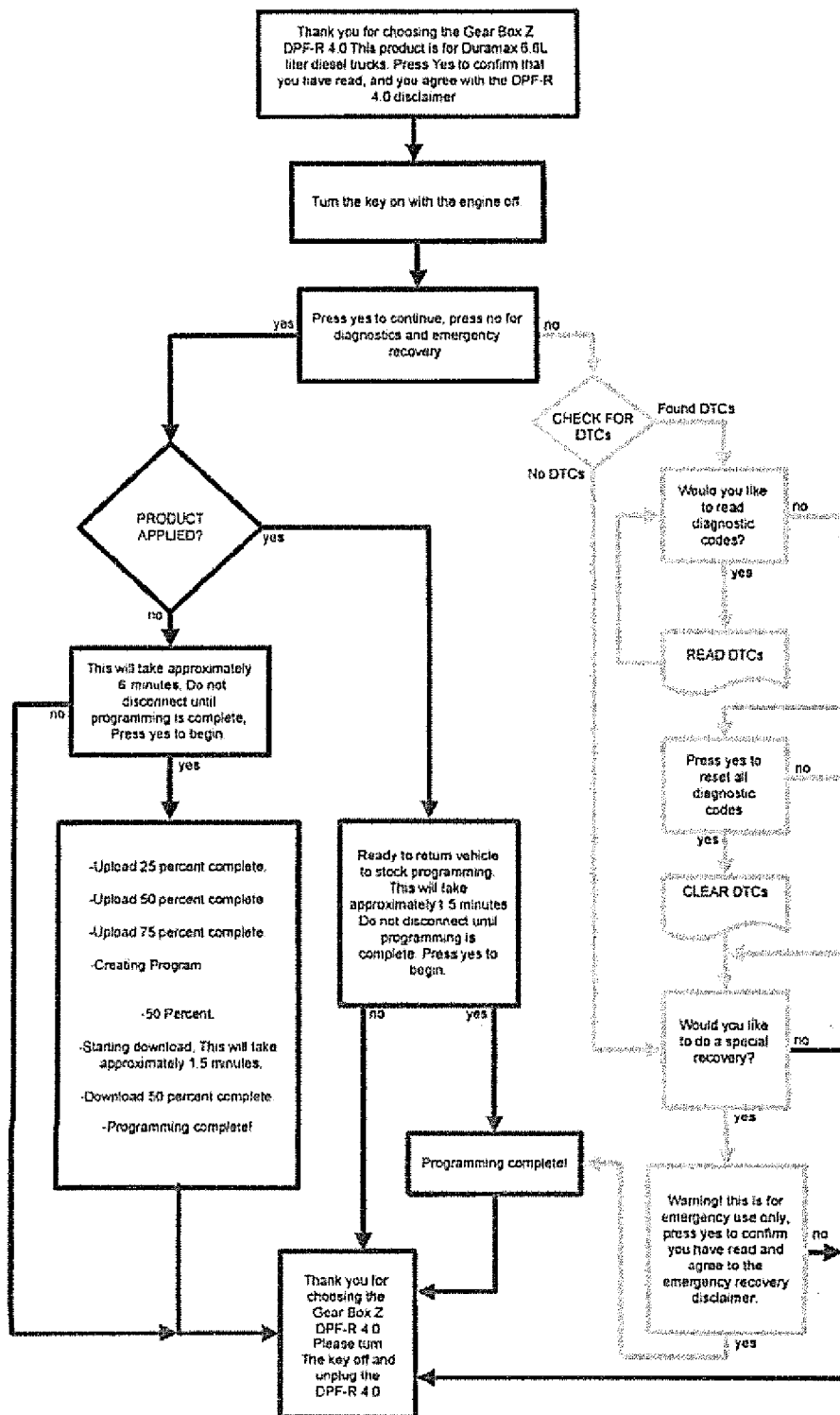
DIAGNOSTIC TROUBLE CODES

P0001 Fuel Volume Regulator Control Circuit
 P0003 Fuel Volume Regulator Control Circuit Low
 P0004 Fuel Volume Regulator Control Circuit High
 P000E Fuel Volume Regulator Control Exceeded 0 Learning Limit
 P0069 MAP - Barometric Pressure Correlation
 P006B MAP/Exhaust Pressure Correlation
 P0067 Fuel Rail System Pressure - Too Low
 P0068 Fuel Rail System Pressure - Too High
 P008C Fuel Cooler Pump Control Circuit/Open
 P008D Fuel Cooler Pump Control Circuit Low
 P008E Fuel Cooler Pump Control Circuit High
 P008F Engine Coolant Temperature/Fuel Temperature Correlation
 P0090 Fuel Pressure Regulator Control Circuit
 P0091 Fuel Pressure Regulator Control Circuit Low
 P0092 Fuel Pressure Regulator Control Circuit High
 P0098 Intake Air Temperature Sensor 2 Circuit Range/Performance
 P0097 Intake Air Temperature Sensor 2 Circuit Low
 P0098 Intake Air Temperature Sensor 2 Circuit High
 P0101 Mass or Volume Air Flow A Circuit Range/Performance
 P0102 Mass or Volume Air Flow A Circuit Low
 P0103 Mass or Volume Air Flow A Circuit High
 P0104 Mass or Volume Air Flow A Circuit Intermittent/Erratic
 P0106 Manifold Absolute Pressure (MAP)/Barometric Pressure (BARO) Sensor Range/Performance
 P0107 Manifold Absolute Pressure (MAP)/Barometric Pressure (BARO) Sensor Low
 P0108 Manifold Absolute Pressure (MAP)/Barometric Pressure (BARO) Sensor High
 P0112 Intake Air Temperature (IAT) Sensor 1 Circuit Low
 P0113 Intake Air Temperature (IAT) Sensor 1 Circuit High
 P0114 Intake Air Temperature (IAT) Sensor 1 Intermittent/Erratic
 P0117 Engine Coolant Temperature Sensor 1 Circuit Low
 P0118 Engine Coolant Temperature Sensor 1 Circuit High
 P0128 Coolant Thermostat (Coolant Temperature Below Thermostat Regulating Temperature)
 P0148 Fuel Delivery Error
 P0149 Fuel Timing Error
 P0188 Engine Fuel Temperature Too High
 P0181 Fuel Temperature Sensor A Circuit Range/Performance
 P0182 Fuel Temperature Sensor A Circuit Low
 P0183 Fuel Temperature Sensor A Circuit High
 P0191 Fuel Rail Pressure Sensor A Circuit Range/Performance
 P0192 Fuel Rail Pressure Sensor A Circuit Low
 P0193 Fuel Rail Pressure Sensor A Circuit High
 P0194 Fuel Rail Pressure Sensor A Circuit Intermittent/Erratic
 P0195 Engine Oil Temperature Sensor Circuit Range/Performance
 P0197 Engine Oil Temperature Sensor Circuit Low
 P0198 Engine Oil Temperature Sensor Circuit High
 P0201 Injector Circuit/Open - Cylinder 1
 P0202 Injector Circuit/Open - Cylinder 2
 P0203 Injector Circuit/Open - Cylinder 3
 P0204 Injector Circuit/Open - Cylinder 4
 P0205 Injector Circuit/Open - Cylinder 5
 P0206 Injector Circuit/Open - Cylinder 6
 P0207 Injector Circuit/Open - Cylinder 7
 P0208 Injector Circuit/Open - Cylinder 8
 P0216 Injector/Injection Timing Control Circuit
 P0219 Engine Overspeed Condition
 P0231 Fuel Pump Secondary Circuit Low
 P0232 Fuel Pump Secondary Circuit High
 P0234 Turbocharger/Supercharger A Overboost Condition
 P0263 Cylinder 1 Contribution/Balance
 P0268 Cylinder 2 Contribution/Balance
 P0269 Cylinder 3 Contribution/Balance
 P0272 Cylinder 4 Contribution/Balance
 P0275 Cylinder 5 Contribution/Balance
 P0278 Cylinder 6 Contribution/Balance
 P0281 Cylinder 7 Contribution/Balance
 P0284 Cylinder 8 Contribution/Balance
 P0287 Vehicle Overspeed Condition
 P0298 Engine Oil Overtemperature Condition
 P02CC Cylinder 1 Fuel Injector Offset Learning at Minimum Limit
 P02CD Cylinder 1 Fuel Injector Offset Learning at Maximum Limit
 P02CE Cylinder 2 Fuel Injector Offset Learning at Minimum Limit
 P02CF Cylinder 2 Fuel Injector Offset Learning at Maximum Limit
 P02D0 Cylinder 3 Fuel Injector Offset Learning at Minimum Limit
 P02D1 Cylinder 3 Fuel Injector Offset Learning at Maximum Limit
 P02D2 Cylinder 4 Fuel Injector Offset Learning at Minimum Limit
 P02D3 Cylinder 4 Fuel Injector Offset Learning at Maximum Limit
 P02D4 Cylinder 5 Fuel Injector Offset Learning at Minimum Limit
 P02D5 Cylinder 5 Fuel Injector Offset Learning at Maximum Limit
 P02D6 Cylinder 6 Fuel Injector Offset Learning at Minimum Limit
 P02D7 Cylinder 6 Fuel Injector Offset Learning at Maximum Limit
 P02D8 Cylinder 7 Fuel Injector Offset Learning at Minimum Limit
 P02D9 Cylinder 7 Fuel Injector Offset Learning at Maximum Limit
 P02DA Cylinder 8 Fuel Injector Offset Learning at Minimum Limit
 P02DB Cylinder 8 Fuel Injector Offset Learning at Maximum Limit
 P0300 Random Misfire Detected
 P0301 Cylinder 1 Misfire Detected
 P0302 Cylinder 2 Misfire Detected
 P0303 Cylinder 3 Misfire Detected
 P0304 Cylinder 4 Misfire Detected
 P0305 Cylinder 5 Misfire Detected
 P0306 Cylinder 6 Misfire Detected

P0307 Cylinder 7 Misfire Detected
 P0308 Cylinder 8 Misfire Detected
 P0336 Crankshaft Position Sensor A Circuit Range/Performance
 P0337 Crankshaft Position Sensor A Circuit Low
 P0341 Camshaft Position Sensor A Circuit Range/Performance (Bank 1 or Single Sensor)
 P0342 Camshaft Position Sensor A Circuit Low (Bank 1 or Single Sensor)
 P0381 Glow Plug/Heater Indicator Circuit
 P0401 Exhaust Gas Recirculation (EGR) Flow Insufficient Detected
 P0402 Exhaust Gas Recirculation (EGR) Flow Excessive Detected
 P0403 Exhaust Gas Recirculation (EGR) Control Circuit
 P0404 Exhaust Gas Recirculation (EGR) Control Circuit Range/Performance
 P0405 Exhaust Gas Recirculation (EGR) Sensor A Circuit Low
 P0406 Exhaust Gas Recirculation (EGR) Sensor A Circuit High
 P0408 Exhaust Gas Recirculation Temperature (EGRT) Sensor A Circuit Range/Performance
 P040C Exhaust Gas Recirculation Temperature (EGRT) Sensor A Circuit Low
 P040D Exhaust Gas Recirculation Temperature (EGRT) Sensor A Circuit High
 P041B Exhaust Gas Recirculation Temperature (EGRT) Sensor B Circuit Range/Performance
 P041C Exhaust Gas Recirculation Temperature (EGRT) Sensor B Circuit Low
 P041D Exhaust Gas Recirculation Temperature (EGRT) Sensor B Circuit High
 P0420 Catalyst System Efficiency Below Threshold (Bank 1)
 P042E Exhaust Gas Recirculation (EGR) Control Stuck Open
 P042F Exhaust Gas Recirculation (EGR) Control Stuck Closed
 P0472 Exhaust Pressure Sensor A Circuit Low
 P0473 Exhaust Pressure Sensor A Circuit High
 P0480 Fan 1 Control Circuit
 P0488 Exhaust Gas Recirculation (EGR) Throttle Control Circuit A Range/Performance
 P0494 Fan Speed Low
 P0495 Fan Speed High
 P0500 Vehicle Speed Sensor A
 P0503 Vehicle Speed Sensor (VSS) A Intermittent Error/High
 P0512 Starter Request Circuit
 P0528 Fan Speed Sensor Circuit No Signal
 P0529 Fan Speed Sensor Circuit Intermittent
 P0544 Exhaust Gas Temperature Sensor Circuit - Bank 1 Sensor 1
 P0545 Exhaust Gas Temperature Sensor Circuit Low - Bank 1 Sensor 1
 P0548 Exhaust Gas Temperature Sensor Circuit High - Bank 1 Sensor 1
 P0560 System Voltage
 P0563 System Voltage High
 P0565 Cruise Control ON Signal
 P0566 Cruise Control OFF Signal
 P0567 Cruise Control RESUME Signal
 P0568 Cruise Control SET Signal
 P0569 Cruise Control COAST Signal
 P0571 Brake Switch A Circuit
 P0600 Serial Communication Link
 P0602 Powertrain Control Module (PCM) Programming Error
 P0603 Internal Control Module Keep Alive Memory (KAM) Error
 P0604 Internal Control Module Random Access Memory (RAM) Error
 P0605 Internal Control Module Read Only Memory (ROM) Error
 P0608 Internal Control Module A/D Processing Performance
 P060C Internal Control Module Main Processor Performance
 P060D Internal Control Module Accelerator Pedal Position Performance
 P0610 Control Module Vehicle Options Error
 P061B Internal Control Module Torque Calculation Performance
 P061C Internal Control Module Engine RPM Performance
 P0620 Generator Control Circuit
 P0625 Generator Field Terminal Circuit Low
 P0626 Generator Field Terminal Circuit High
 P0627 Fuel Pump A Control Circuit Open
 P0628 Fuel Pump A Control Circuit Low
 P0629 Fuel Pump A Control Circuit High
 P062D Fuel Injector Driver Circuit Performance Bank 1
 P062E Fuel Injector Driver Circuit Performance Bank 2
 P0642 Sensor Reference Voltage A Circuit Low
 P0643 Sensor Reference Voltage A Circuit High
 P0652 Sensor Reference Voltage B Circuit Low
 P0653 Sensor Reference Voltage B Circuit High
 P0670 Glow Plug Control Module (GPCM) Control Circuit/Open
 P0671 Cylinder 1 Glow Plug Circuit/Open
 P0672 Cylinder 2 Glow Plug Circuit/Open
 P0673 Cylinder 3 Glow Plug Circuit/Open
 P0674 Cylinder 4 Glow Plug Circuit/Open
 P0675 Cylinder 5 Glow Plug Circuit/Open
 P0676 Cylinder 6 Glow Plug Circuit/Open
 P0677 Cylinder 7 Glow Plug Circuit/Open
 P0678 Cylinder 8 Glow Plug Circuit/Open
 P0694 Glow Plug Control Module (GPCM) to Powertrain Control Module (PCM) Communication Circuit Range/Performance
 P0691 Fan 1 Control Circuit Low
 P0692 Fan 1 Control Circuit High
 P0703 Brake Switch B Input Circuit
 P0704 Clutch Switch Input Circuit
 P0A09 DC/DC Converter Status Circuit Low
 P0A10 DC/DC Converter Status Circuit High
 P1000 On-Board Diagnostic (OBD) Systems Readiness Test Not Complete
 P1102 Mass Air Flow Sensor In Range But Lower Than Expected
 P1103 Mass Air Flow Sensor In Range But Higher Than Expected
 P1111 System Pass
 P115A Low Fuel Level - Forced Limited Power
 P117B Exhaust Gas Temperature Sensor Correlation - Bank 1
 P117F Fuel Pressure Regulator Control Exceeded Learning Limits
 P1184 Engine Oil Temperature Sensor Out Of Self-Test Range
 P120F Fuel Pressure Regulator Excessive Variation
 P123C Cold Start Turbo Protection - Forced Limited Power
 P1260 Throttle Disconnected, Vehicle Immobilized
 P127A Aborted KOER - Fuel Pressure Failure
 P132A Turbocharger/Supercharger Boost Control A Electrical
 P132B Turbocharger/Supercharger Boost Control A Performance
 P132C Turbocharger/Supercharger Boost Control A Voltage
 P1335 Exhaust Gas Recirculation (EGR) Position Sensor Minimum/Maximum Stop Performance
 P1336 Crankshaft/Camshaft Sensor Range/Performance
 P138D Turbocharger Boost Control A Temperature Too High
 P1397 System Voltage Out Of Self-Test Range
 P140B Exhaust Gas Recirculation (EGR) Flow Out Of Self-Test Range
 P1404 A/C Demand Out Of Self-Test Range
 P1501 Vehicle Speed Sensor Out Of Self-Test Range
 P1531 Invalid Test - Accelerator Pedal Movement
 P1536 Parking Brake Switch Circuit
 P1551 Cylinder 1 Injector Circuit Range/Performance
 P1552 Cylinder 2 Injector Circuit Range/Performance
 P1553 Cylinder 3 Injector Circuit Range/Performance
 P1554 Cylinder 4 Injector Circuit Range/Performance
 P1555 Cylinder 5 Injector Circuit Range/Performance
 P1556 Cylinder 6 Injector Circuit Range/Performance
 P1557 Cylinder 7 Injector Circuit Range/Performance
 P1558 Cylinder 8 Injector Circuit Range/Performance
 P1566 Electronic Throttle to PCM Communication Error
 P162E Internal Control Module PTO Performance
 P1635 Time/Axle Out Of Acceptable Range
 P1639 Vehicle ID Block Corrupted, Not Programmed
 P1703 Brake Switch Out Of Self-Test Range
 P1705 Transmission Range Circuit Not Indicating Park/Neutral During Self-Test
 P1725 Insufficient Engine Speed Increase During Self-Test
 P1726 Insufficient Engine Speed Decrease During Self-Test
 P174E Output Shaft Speed / ABS Wheel Speed Correlation
 P179A Controller Area Network (CAN) Engine Control Module (ECM)/Turbocharger Boost Control A Actuator Circuit Malfunction
 P2002 Diesel Particulate Filter Efficiency Below Threshold (Bank 1)
 P200E Catalyst System Over Temperature (Bank 1)
 P2031 Exhaust Gas Temperature Sensor Circuit Bank 1 Sensor 2
 P2032 Exhaust Gas Temperature Sensor Circuit Low Bank 1 Sensor 2
 P2033 Exhaust Gas Temperature Sensor Circuit High Bank 1 Sensor 2
 P2080 Exhaust Gas Temperature Sensor Circuit Range/Performance Bank 1 Sensor 1
 P2081 Exhaust Gas Temperature Sensor Circuit Intermittent Bank 1 Sensor 1
 P2084 Exhaust Gas Temperature Sensor Circuit Range/Performance Bank 1 Sensor 2
 P2085 Exhaust Gas Temperature Sensor Circuit Intermittent Bank 1 Sensor 2
 P20E2 Exhaust Gas Temperature Sensor 1/2 Correlation Bank 1
 P20E3 Exhaust Gas Temperature Sensor 1/3 Correlation Bank 1
 P20E4 Exhaust Gas Temperature Sensor 2/3 Correlation Bank 1
 P2122 Throttle/Pedal Position Sensor/Switch D Circuit Low
 P2123 Throttle/Pedal Position Sensor/Switch D Circuit High
 P2127 Throttle/Pedal Position Sensor/Switch E Circuit Low
 P2128 Throttle/Pedal Position Sensor/Switch E Circuit High
 P2138 Throttle/Pedal Position Sensor/Switch D/E Voltage Correlation
 P215A Vehicle Speed / Wheel Speed Correlation
 P215B Vehicle Speed / Output Shaft Speed Correlation
 P2199 Intake Air Temperature (IAT) 1/2 Correlation
 P2228 Barometric Pressure Circuit Low
 P2229 Barometric Pressure Circuit High
 P2230 Barometric Pressure Circuit Intermittent
 P2262 Turbo/Super Charger Boost Pressure Not Detected — Mechanical
 P2263 Turbo/Super Charger Boost System Performance
 P2269 Water in Fuel Condition
 P2289 Injector Control Pressure Too High - Engine Off
 P2291 Injector Control Pressure Too Low - Engine Cranking
 P242A Exhaust Gas Temperature Sensor Circuit Bank 1 Sensor 3
 P242B Exhaust Gas Temperature Sensor Circuit Range/Performance Bank 1 Sensor 3
 P242C Exhaust Gas Temperature Sensor Circuit Low Bank 1 Sensor 3
 P242D Exhaust Gas Temperature Sensor Circuit High Bank 1 Sensor 3
 P242E Exhaust Gas Temperature Sensor Circuit Intermittent Error Bank 1 Sensor 3
 P242F Diesel Particulate Filter Restriction - Ash Accumulation
 P244A Diesel Particulate Filter Differential Pressure Too Low
 P244C Exhaust Temperature Too Low For Particulate Filter Regeneration, Bank 1
 P244D Exhaust Temperature Too High For Particulate Filter Regeneration, Bank 1
 P2452 Diesel Particulate Filter Pressure Sensor A Circuit
 P2453 Diesel Particulate Filter Pressure Sensor A Circuit Range/Performance
 P2454 Diesel Particulate Filter Pressure Sensor A Circuit Low
 P2455 Diesel Particulate Filter Pressure Sensor A Circuit High
 P2456 Diesel Particulate Filter Pressure Sensor A Circuit Intermittent/Error
 P2457 Exhaust Gas Recirculation (EGR) Cooler System Performance
 P2458 Diesel Particulate Filter Regeneration Duration
 P2459 Diesel Particulate Filter Regeneration Frequency
 P2463 Diesel Particulate Filter - Soot Accumulation
 P246C Diesel Particulate Filter Restriction - Forced Limited Power
 P2545 Torque Management Request Input Signal A Range / Performance
 P2563 Turbocharger Boost Control Position Sensor A Circuit Range Performance
 P2610 Electronic Control Module (ECM)/Powertrain Control Module (PCM) Internal Engine Off Timer Performance
 U0073 Control Module Communication Bus A Off
 U0101 Lost Communication With Transmission Control Module (TCM)
 U0121 Lost Communication With The Anti-lock Brake System (ABS) Control Module
 U0137 Lost Communication With Trailer Brake Control (TBC) Module
 U0151 Lost Communication With Restraints Control Module (RCM)
 U0155 Lost Communication With Instrument Panel Cluster (IC) Control Module

VOICE PROMPT

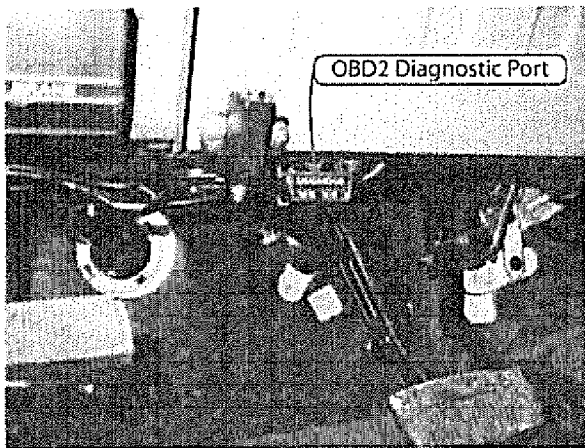
MENU FLOW CHART



FORD PLUS

DPF-R 4.0 INSTALLATIONS

INSTRUCTIONS



Plug the module into the diagnostic port. The diagnostic port is under the dash, below and to the left of the steering column.

The device will power up automatically.

Follow the voice prompts. Navigate the menu with the "YES" and "NO" buttons.

Power/function (green) light will flash when it is communicating.

Warning (red) light will be on while writing to the ECU. DO NOT UNPLUG WHILE THE RED LIGHT IS ON

If you are using with a chip/programmer it is recommended that you install the DPF-R first.

EXHAUST NOTES: Exhaust sensors need to be connected to the truck wiring harness. Exhaust sensors do not need to go back into the pipe.

DPF-R 4.0 DISCLAIMER

THIS IS A HIGH PERFORMANCE PRODUCT. USE AT YOUR OWN RISK. Do not use this Product until you (the "Buyer") have carefully read this Disclaimer. The installation of this Product indicates that you have read and understand, and accept all of the terms of, this Disclaimer.

•Gear Box Z Inc., their affiliates, distributors, dealers, et al. (hereafter referred to

as the "Seller") shall not be responsible for the Product's proper installation, use and service. Rather, the Buyer shall look solely to the installer who installs the Product for any service and support needed by the Buyer with respect thereto, as well as any damage that may be done to vehicle components as a result of modifications made by the installer.

• The Buyer is responsible to fully understand the capability and limitations of his/her vehicle according to manufacturer specifications, warnings and instructions and agrees to hold the Seller harmless from any damage resulting from failure to adhere to such specifications, warnings and/or instructions. The Buyer is also responsible to obey all applicable federal, state, and local laws, statutes, and ordinances when operating his/her vehicle, and the Buyer agrees to hold Seller harmless from any violation thereof.

• The Seller's Limited Warranty for this Product is the Buyer's exclusive warranty and is in lieu of all other warranties, express or implied, except as may be required by applicable law. Without limiting the generality of the foregoing, the Seller shall not be liable for any breach of any other written or oral warranties given to the Buyer by any third party(ies) such as those (if any) given to the Buyer by dealers or distributors of the Product.

• Consult your vehicle warranty before using this Product. Under no circumstances will the Seller be liable for the voidance of the Buyer's vehicle warranty. Rather, the Buyer assumes all risk and responsibility if an automotive manufacturer and/or dealer void the Buyer's vehicle warranty due to use of this Product.

• This product modifies the programming on the truck's computer. **WARNING:** if the download fails for any reason the truck may be rendered unusable until a recovery can be done on the ECU. BY USING THIS PRODUCT YOU AGREE THAT YOU UNDERSTAND AND TAKE RESPONSIBILITY FOR THIS RISK.

• Operate your vehicle at all times in a safe manner. Regardless of any capability, feature or function of the Seller's Products, the Buyer understands and acknowledges that it is the Buyer's sole responsibility to ensure that (A) the motor vehicle is operated in a safe and legal manner, (B) the motor vehicle is not driven faster than the lower of the speed limit or the speed rating of the tires on the vehicle in which the Seller's product is installed, and (C) the maximum RPM or speed rating of the engine is not exceeded while operating the motor vehicle. In no case will the Seller be held liable, and the Buyer assumes all risk and responsibility, for any property damage, personal injury and/or death that may occur in the event the Buyer operates the vehicle in an unsafe manner, violates the law or exceeds the above mentioned limits. Please check your local, state and federal laws to determine if you are within your rights to modify your vehicle's exhaust. The Seller makes no representation or warranty, express or implied that the use of its Products will comply with local, state, or Federal emission levels, noise levels or safety standards. The Buyer assumes all responsibility for such use and compliance.

SELLER IS NOT LIABLE FOR AND HEREBY EXCLUDES ANY AND ALL INDIRECT, INCIDENTAL, SPECIAL OR CONSEQUENTIAL DAMAGES RELATING TO THE PRODUCTS COVERED BY THIS DISCLAIMER. The Seller's Limited Warranty for this Product gives you specific legal rights, and you may also have other rights which may vary from state to state. Pertinent state law shall control for what Period of time following the sale a consumer may seek a remedy under the implied warranty of merchantability or fitness for a particular purpose. Some states do not allow the exclusion or limitation of incidental or consequential damages so the above limitations or exclusions may not apply to you.

IN THE EVENT THAT THE BUYER DOES NOT AGREE WITH THIS DISCLAIMER, THE BUYER MAY PROMPTLY RETURN THIS PRODUCT, IN A NEW AND UNUSED CONDITION, WITH A DATED PROOF OF PURCHASE, TO THE PLACE OF PURCHASE WITHIN FOURTEEN (14) DAYS FROM DATE OF PURCHASE FOR A FULL REFUND.

EMERGENCY RECOVERY DISCLAIMER

The Special Recovery function of this product is intended only as an emergency use in case something goes wrong during programming of the ECU (ie power failure, accidental unplugging of the programmer, etc.) This function should only be used as a last resort. This function should not be used to recover or troubleshoot another truck. This function is not guaranteed to work, and may not apply the same firmware as was originally on the truck. The Special Recovery function of this product is not intended to be used to troubleshoot or diagnose problems. Under no circumstances will the Seller be liable for any damages or expenses incurred by reason of the use of this product. USE OF THE SPECIAL RECOVERY FUNCTION OF THIS PRODUCT INDICATES THE USER UNDERSTANDS AND AGREES WITH THIS EMERGENCY RECOVERY DISCLAIMER AND THE DPF-R 4.0 DISCLAIMER.



DPF-R 4.0 DIAGNOSTICS INSTRUCTIONS

THIS FUNCTION IS FOR THE CONVENIENCE OF THE OWNER AND IS NOT INTENDED TO TAKE THE PLACE OF A QUALIFIED TECHNICIAN.

Plug the module into the diagnostic port. The diagnostic port is under the dash, below and to the left of the steering column.

The device will power up automatically.

Follow the voice prompts. Navigate the menu with the "YES" and "NO" buttons.

Navigate to "Diagnostics and emergency recovery" menu.

Press "YES" when asked if you would like to read diagnostic codes. When the product is finished reading codes it will ask if you want to read them again. Press "NO" to move on to the code clearing menu.

Press "YES" or "NO" to clear or leave trouble codes.

Press "NO" to skip the emergency recovery and you will be prompted to unplug the device.

DIAGNOSTIC TROUBLE CODES

P0001 Fuel Volume Regulator Control Circuit
 P0003 Fuel Volume Regulator Control Circuit Low
 P0004 Fuel Volume Regulator Control Circuit High
 P0005 Fuel Volume Regulator Control Exceeded Learning Limit
 P0009 MAP/Barometric Pressure Correlation
 P0068 MAP/Exhaust Pressure Correlation
 P0067 Fuel Rail/System Pressure - Too Low
 P0069 Fuel Rail/System Pressure - Too High
 P0080 Fuel Cooler Pump Control Circuit/Open
 P008D Fuel Cooler Pump Control Circuit Low
 P008E Fuel Cooler Pump Control Circuit High
 P009F Engine Coolant Temperature/Fuel Temperature Correlation
 P0550 Fuel Pressure Regulator Control Circuit
 P0551 Fuel Pressure Regulator Control Circuit Low
 P0552 Fuel Pressure Regulator Control Circuit High
 P0098 Intake Air Temperature Sensor 2 Circuit Range/Performance
 P0097 Intake Air Temperature Sensor 2 Circuit Low
 P0098 Intake Air Temperature Sensor 2 Circuit High
 P0101 Mass or Volume Air Flow A Circuit Range/Performance
 P0102 Mass or Volume Air Flow A Circuit Low
 P0103 Mass or Volume Air Flow A Circuit High
 P0104 Mass or Volume Air Flow A Circuit Intermittent/Erratic
 P0108 Manifold Absolute Pressure (MAP/BARO) Sensor Range/Performance
 P0107 Manifold Absolute Pressure (MAP/Barometric Pressure (BARO) Sensor Low
 P0108 Manifold Absolute Pressure (MAP/Barometric Pressure (BARO) Sensor High
 P0112 Intake Air Temperature (IAT) Sensor 1 Circuit Low
 P0113 Intake Air Temperature (IAT) Sensor 1 Circuit High
 P0114 Intake Air Temperature (IAT) Sensor 1 Intermittent/Erratic
 P0117 Engine Coolant Temperature Sensor 1 Circuit Low
 P0118 Engine Coolant Temperature Sensor 1 Circuit High
 P0128 Coolant Thermostat (Coolant Temperature Below Thermostat Regulating Temperature)
 P0148 Fuel Delivery Error
 P0149 Fuel Timing Error
 P0168 Engine Fuel Temperature Too High
 P0181 Fuel Temperature Sensor A Circuit Range/Performance
 P0182 Fuel Temperature Sensor A Circuit Low
 P0183 Fuel Temperature Sensor A Circuit High
 P0181 Fuel Rail Pressure Sensor A Circuit Range/Performance
 P0192 Fuel Rail Pressure Sensor A Circuit Low
 P0193 Fuel Rail Pressure Sensor A Circuit High
 P0194 Fuel Rail Pressure Sensor A Circuit Intermittent/Erratic
 P0198 Engine Oil Temperature Sensor Circuit Range/Performance
 P0197 Engine Oil Temperature Sensor Circuit Low
 P0199 Engine Oil Temperature Sensor Circuit High
 P0201 Injector Circuit/Open - Cylinder 1
 P0202 Injector Circuit/Open - Cylinder 2
 P0203 Injector Circuit/Open - Cylinder 3
 P0204 Injector Circuit/Open - Cylinder 4
 P0205 Injector Circuit/Open - Cylinder 5
 P0206 Injector Circuit/Open - Cylinder 6
 P0207 Injector Circuit/Open - Cylinder 7
 P0208 Injector Circuit/Open - Cylinder 8
 P0218 Injector/Injection Timing Control Circuit
 P0219 Engine Overspeed Condition
 P0231 Fuel Pump Secondary Circuit Low
 P0232 Fuel Pump Secondary Circuit High
 P0234 Turbocharger/Supercharger A Overboost Condition
 P0263 Cylinder 1 Contribution/Balance
 P0269 Cylinder 2 Contribution/Balance
 P0269 Cylinder 3 Contribution/Balance
 P0272 Cylinder 4 Contribution/Balance
 P0275 Cylinder 5 Contribution/Balance
 P0278 Cylinder 6 Contribution/Balance
 P0281 Cylinder 7 Contribution/Balance
 P0284 Cylinder 8 Contribution/Balance
 P0297 Vehicle Overspeed Condition
 P0298 Engine Oil Overtemperature Condition
 P02CC Cylinder 1 Fuel Injector Offset Learning at Minimum Limit
 P02CD Cylinder 1 Fuel Injector Offset Learning at Maximum Limit
 P02CE Cylinder 2 Fuel Injector Offset Learning at Minimum Limit
 P02CF Cylinder 2 Fuel Injector Offset Learning at Maximum Limit
 P02D0 Cylinder 3 Fuel Injector Offset Learning at Minimum Limit
 P02D1 Cylinder 3 Fuel Injector Offset Learning at Maximum Limit
 P02D2 Cylinder 4 Fuel Injector Offset Learning at Minimum Limit
 P02D3 Cylinder 4 Fuel Injector Offset Learning at Maximum Limit
 P02D4 Cylinder 5 Fuel Injector Offset Learning at Minimum Limit
 P02D5 Cylinder 5 Fuel Injector Offset Learning at Maximum Limit
 P02D6 Cylinder 6 Fuel Injector Offset Learning at Minimum Limit
 P02D7 Cylinder 6 Fuel Injector Offset Learning at Maximum Limit
 P02D8 Cylinder 7 Fuel Injector Offset Learning at Minimum Limit
 P02D9 Cylinder 7 Fuel Injector Offset Learning at Maximum Limit
 P02DA Cylinder 8 Fuel Injector Offset Learning at Minimum Limit
 P02DB Cylinder 8 Fuel Injector Offset Learning at Maximum Limit
 P0300 Random Misfire Detected
 P0301 Cylinder 1 Misfire Detected
 P0302 Cylinder 2 Misfire Detected
 P0303 Cylinder 3 Misfire Detected
 P0304 Cylinder 4 Misfire Detected
 P0305 Cylinder 5 Misfire Detected
 P0306 Cylinder 6 Misfire Detected
 P0307 Cylinder 7 Misfire Detected
 P0308 Cylinder 8 Misfire Detected
 P0336 Crankshaft Position Sensor A Circuit Range/Performance

P0337 Crankshaft Position Sensor A Circuit Low
 P0341 Crankshaft Position Sensor A Circuit Range/Performance (Bank 1 or Single Sensor)
 P0342 Crankshaft Position Sensor A Circuit Low (Bank 1 or Single Sensor)
 P0381 Glow Plug/Heater Indicator Circuit
 P0401 Exhaust Gas Recirculation (EGR) Flow Insufficient Detected
 P0402 Exhaust Gas Recirculation (EGR) Flow Excessive Detected
 P0403 Exhaust Gas Recirculation (EGR) Control Circuit
 P0404 Exhaust Gas Recirculation (EGR) Control Circuit Range/Performance
 P0405 Exhaust Gas Recirculation (EGR) Sensor A Circuit Low
 P0406 Exhaust Gas Recirculation (EGR) Sensor A Circuit High
 P0408 Exhaust Gas Recirculation Temperature (EGRT) Sensor A Circuit Range/Performance
 P040C Exhaust Gas Recirculation Temperature (EGRT) Sensor A Circuit Low
 P040D Exhaust Gas Recirculation Temperature (EGRT) Sensor A Circuit High
 P041B Exhaust Gas Recirculation Temperature (EGRT) Sensor B Circuit Range/Performance
 P041C Exhaust Gas Recirculation Temperature (EGRT) Sensor B Circuit Low
 P041D Exhaust Gas Recirculation Temperature (EGRT) Sensor B Circuit High
 P0420 Catalyst System Efficiency Below Threshold (Bank 1)
 P042E Exhaust Gas Recirculation (EGR) Control Stuck Open
 P042F Exhaust Gas Recirculation (EGR) Control Stuck Closed
 P0472 Exhaust Pressure Sensor A Circuit Low
 P0473 Exhaust Pressure Sensor A Circuit High
 P0480 Fan 1 Control Circuit
 P048B Exhaust Gas Recirculation (EGR) Throttle Control Circuit A Range/Performance
 P0484 Fan Speed Low
 P0485 Fan Speed High
 P0500 Vehicle Speed Sensor A
 P0503 Vehicle Speed Sensor (VSS) A Intermittent/Erratic High
 P0512 Starter Request Circuit
 P0528 Fan Speed Sensor Circuit No Signal
 P0529 Fan Speed Sensor Circuit Intermittent
 P0544 Exhaust Gas Temperature Sensor Circuit - Bank 1 Sensor 1
 P0545 Exhaust Gas Temperature Sensor Circuit Low - Bank 1 Sensor 1
 P0546 Exhaust Gas Temperature Sensor Circuit High - Bank 1 Sensor 1
 P0560 System Voltage
 P0563 System Voltage High
 P0565 Cruise Control ON Signal
 P0566 Cruise Control OFF Signal
 P0567 Cruise Control RESUME Signal
 P0568 Cruise Control SET Signal
 P0569 Cruise Control COAST Signal
 P0571 Brake Switch A Circuit
 P0600 Serial Communication Link
 P0602 Powertrain Control Module (PCM) Programming Error
 P0603 Internal Control Module Keep-Alive Memory (KAM) Error
 P0604 Internal Control Module Random Access Memory (RAM) Error
 P0605 Internal Control Module Read-Only Memory (ROM) Error
 P060B Internal Control Module A/D Processing Performance
 P060C Internal Control Module Main Processor Performance
 P060D Internal Control Module Accelerator Pedal Position Performance
 P0610 Control Module Vehicle Options Error
 P061B Internal Control Module Torque Calculation Performance
 P061C Internal Control Module Engine RPM Performance
 P0620 Generator Control Circuit
 P0625 Generator Field Terminal Circuit Low
 P0626 Generator Field Terminal Circuit High
 P0627 Fuel Pump A Control Circuit Open
 P0628 Fuel Pump A Control Circuit Low
 P0629 Fuel Pump A Control Circuit High
 P062D Fuel Injector Driver Circuit Performance Bank 1
 P062E Fuel Injector Driver Circuit Performance Bank 2
 P0642 Sensor Reference Voltage A Circuit Low
 P0643 Sensor Reference Voltage A Circuit High
 P0642 Sensor Reference Voltage B Circuit Low
 P0643 Sensor Reference Voltage B Circuit High
 P0670 Glow Plug Control Module (GPCM) Control Circuit/Open
 P0671 Cylinder 1 Glow Plug Circuit/Open
 P0672 Cylinder 2 Glow Plug Circuit/Open
 P0673 Cylinder 3 Glow Plug Circuit/Open
 P0674 Cylinder 4 Glow Plug Circuit/Open
 P0675 Cylinder 5 Glow Plug Circuit/Open
 P0676 Cylinder 6 Glow Plug Circuit/Open
 P0677 Cylinder 7 Glow Plug Circuit/Open
 P0678 Cylinder 8 Glow Plug Circuit/Open
 P0694 Glow Plug Control Module (GPCM) to Powertrain Control Module (PCM) Communication Circuit Range/Performance
 P0691 Fan 1 Control Circuit Low
 P0692 Fan 1 Control Circuit High
 P0703 Brake Switch B Input Circuit
 P0704 Clutch Switch Input Circuit
 P0A09 DC/DC Converter Status Circuit Low
 P0A10 DC/DC Converter Status Circuit High
 P1000 On-Board Diagnostic (OBD) Systems Readiness Test Not Complete
 P1102 Mass Air Flow Sensor In Range But Lower Than Expected
 P1103 Mass Air Flow Sensor In Range But Higher Than Expected
 P1111 System Pass
 P115A Low Fuel Level - Forced Limited Power
 P1170 Exhaust Gas Temperature Sensor Correlation - Bank 1
 P117F Fuel Pressure Regulator Control Exceeded Learning Limits
 P1184 Engine Oil Temperature Sensor Out Of Self-Test Range
 P120F Fuel Pressure Regulator Excessive Variation
 P123C Cold Start Turbo Protection - Forced Limited Power
 P1260 Theft Detected, Vehicle Immobilized
 P127A Aborted XCR - Fuel Pressure Failure
 P132A Turbocharger/Supercharger Boost Control A Electrical
 P132B Turbocharger/Supercharger Boost Control A Performance
 P132C Turbocharger/Supercharger Boost Control A Voltage
 P1335 Exhaust Gas Recirculation (EGR) Position Sensor Minimum/Maximum Stop Performance
 P1338 Crankshaft/Camshaft Sensor Range/Performance
 P138D Turbocharger Boost Control A Temperature Too High
 P1397 System Voltage Out Of Self-Test Range
 P140B Exhaust Gas Recirculation (EGR) Flow Out Of Self-Test Range
 P1464 A/C Demand Out Of Self-Test Range
 P1501 Vehicle Speed Sensor Out Of Self-Test Range
 P1531 Invalid Test - Accelerator Pedal Movement
 P1536 Parking Brake Switch Circuit
 P1551 Cylinder 1 Injector Circuit Range/Performance
 P1552 Cylinder 2 Injector Circuit Range/Performance
 P1553 Cylinder 3 Injector Circuit Range/Performance
 P1554 Cylinder 4 Injector Circuit Range/Performance
 P1555 Cylinder 5 Injector Circuit Range/Performance
 P1556 Cylinder 6 Injector Circuit Range/Performance
 P1557 Cylinder 7 Injector Circuit Range/Performance
 P1558 Cylinder 8 Injector Circuit Range/Performance
 P1586 Electronic Throttle to PCM Communication Error
 P162E Internal Control Module PTO Performance
 P1635 Time/Aide Out Of Acceptable Range
 P1639 Vehicle ID Block Corrupted, Not Programmed
 P1703 Brake Switch Out Of Self-Test Range
 P1705 Transmission Range Circuit Not Indicating Park/Neutral During Self-Test
 P1725 Insufficient Engine Speed Increase During Self-Test
 P1729 Insufficient Engine Speed Decrease During Self-Test
 P174E Output Shaft Speed / ABS Wheel Speed Correlation
 P179A Controller Area Network (CAN) Engine Control Module (ECM)/Turbocharger Boost Control A Actuator Circuit Malfunction
 P2002 Diesel Particulate Filter Efficiency Below Threshold (Bank 1)
 P200E Catalyst System Over Temperature (Bank 1)
 P2031 Exhaust Gas Temperature Sensor Circuit Bank 1 Sensor 2
 P2032 Exhaust Gas Temperature Sensor Circuit Low Bank 1 Sensor 2
 P2033 Exhaust Gas Temperature Sensor Circuit High Bank 1 Sensor 2
 P2080 Exhaust Gas Temperature Sensor Circuit Range/Performance Bank 1 Sensor 1
 P2081 Exhaust Gas Temperature Sensor Circuit Intermittent Bank 1 Sensor 1
 P2084 Exhaust Gas Temperature Sensor Circuit Range/Performance Bank 1 Sensor 2
 P2085 Exhaust Gas Temperature Sensor Circuit Intermittent Bank 1 Sensor 2
 P20E2 Exhaust Gas Temperature Sensor 1/2 Correlation Bank 1
 P20E3 Exhaust Gas Temperature Sensor 1/3 Correlation Bank 1
 P20E4 Exhaust Gas Temperature Sensor 2/3 Correlation Bank 1
 P2122 Throttle/Pedal Position Sensor/Switch D Circuit Low
 P2123 Throttle/Pedal Position Sensor/Switch D Circuit High
 P2127 Throttle/Pedal Position Sensor/Switch E Circuit Low
 P2128 Throttle/Pedal Position Sensor/Switch E Circuit High
 P2138 Throttle/Pedal Position Sensor/Switch D/E Voltage Correlation
 P215A Vehicle Speed / Wheel Speed Correlation
 P215B Vehicle Speed / Output Shaft Speed Correlation
 P2199 Intake Air Temperature (IAT) 1/2 Correlation
 P2228 Barometric Pressure Circuit Low
 P2229 Barometric Pressure Circuit High
 P2230 Barometric Pressure Circuit Intermittent
 P2282 Turbo/Super Charger Boost Pressure Not Detected - Mechanical
 P2283 Turbo/Super Charger Boost System Performance
 P2289 Water in Fuel Condition
 P2289 Injector Control Pressure Too High - Engine Off
 P2291 Injector Control Pressure Too Low - Engine Cranking
 P242A Exhaust Gas Temperature Sensor Circuit Bank 1 Sensor 3
 P242B Exhaust Gas Temperature Sensor Circuit Range/Performance Bank 1 Sensor 3
 P242C Exhaust Gas Temperature Sensor Circuit Low Bank 1 Sensor 3
 P242D Exhaust Gas Temperature Sensor Circuit High Bank 1 Sensor 3
 P242E Exhaust Gas Temperature Sensor Circuit Intermittent/Erratic Bank 1 Sensor 3
 P242F Diesel Particulate Filter Restriction - Ash Accumulation
 P244A Diesel Particulate Filter Differential Pressure Too Low
 P244C Exhaust Temperature Too Low For Particulate Filter Regeneration, Bank 1
 P244D Exhaust Temperature Too High For Particulate Filter Regeneration, Bank 1
 P2452 Diesel Particulate Filter Pressure Sensor A Circuit
 P2453 Diesel Particulate Filter Pressure Sensor A Circuit Range/Performance
 P2454 Diesel Particulate Filter Pressure Sensor A Circuit Low
 P2455 Diesel Particulate Filter Pressure Sensor A Circuit High
 P245B Diesel Particulate Filter Pressure Sensor A Circuit Intermittent/Erratic
 P2457 Exhaust Gas Recirculation (EGR) Cooler System Performance
 P2458 Diesel Particulate Filter Regeneration Duration
 P2459 Diesel Particulate Filter Regeneration Frequency
 P2463 Diesel Particulate Filter - Soot Accumulation
 P246C Diesel Particulate Filter Restriction - Forced Limited Power
 P2545 Torque Management Request Input Signal A Range / Performance
 P2583 Turbocharger Boost Control Position Sensor A Circuit Range/Performance
 P2610 Electronic Control Module (ECM)/Powertrain Control Module (PCM) Internal Engine Off Timer Performance
 U0073 Control Module Communication Bus A Off
 U0101 Lost Communication With Transmission Control Module (TCM)
 U0121 Lost Communication With The Anti-lock Brake System (ABS) Control Module
 U0137 Lost Communication With Trailer Brake Control (TBC) Module
 U0151 Lost Communication With Restraints Control Module (RCM)
 U0155 Lost Communication With Instrument Panel Cluster (IC) Control Module

VOICE PROMPT

MENU FLOW CHART

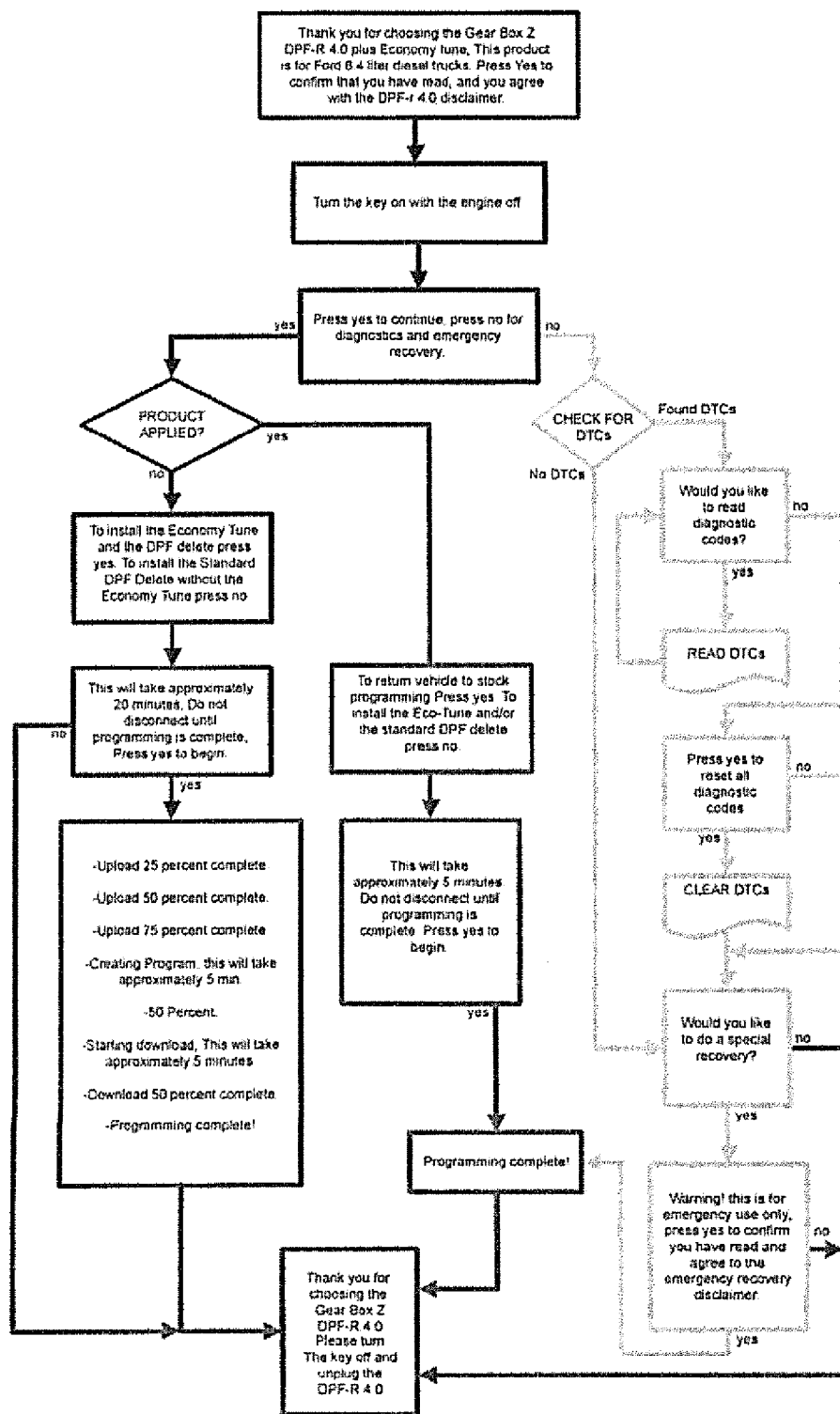


EXHIBIT C

From: Galer, Rose </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=40D0B0FE2FAF4253AB72A2F953C68B85-GALER, ROSE>
To: matt@barlowlawgroup.com
CC: Bickmore, Ryan
Sent: 7/24/2017 2:58:02 PM
Subject: Gear Box Z's Response to EPA's Information Request

Mr. Barlow,

We have received Gear Box Z's response to our information request and are currently reviewing the information. The materials frequently refer to "Maintenance Mode," and we would like to know more about its purpose and function. Specifically:

1. Are all of the tuners listed in Table 2 equipped with Maintenance Mode when they are purchased from the supplier or is that a feature that Gear Box Z adds?
2. Who developed the Maintenance Mode calibration?
3. Provide a more detailed description of how Maintenance Mode works, including how it prevents diagnostic trouble codes or interferes with the vehicle OBD system's ability to detect non-functioning or missing emission related parts.
4. Provide the Maintenance Mode Description sheet noted at the bottom of Table 2.

Please do not hesitate to reach out if you have any questions about this follow-up request.

Thank you,
Rose Galer
Air & TRI Section
Enforcement Division
EPA Region 9 - San Francisco
415-947-4289 Office

EXHIBIT D



HC 65 Box 537
3285 S. Hwy 389, #101
Fredonia, AZ 86022
(602) 461-8863
matt@barlowlawgroup.com

August 25, 2107

VIA CERTIFIED MAIL

Matt Salazar, Manager, Air Enforcement Office
Enforcement Division
Attn: Rose Galer, Environmental Protection Specialist
U.S. Environmental Protection Agency, Region IX
75 Hawthorne St. (ENF-2-1)
San Francisco, CA 94105

Re: **IN THE MATTER OF GEAR BOX Z, INC.**
Response to Email Dated July 24, 2017.

Rose Galer:

Please see the following responses to each question:

1. Are all of the tuners listed in Table 2 equipped with Maintenance Mode when they are purchased from the supplier or is that a feature that Gear Box Z adds?

RESPONSE: Maintenance Mode is a feature that is added by Gear Box Z.

2. Who developed the Maintenance Mode calibration?

RESPONSE: The Maintenance Mode calibration is developed by Gear Box Z.

3. Provide a more detailed description of how the Maintenance Mode works, including how it prevents diagnostic trouble codes or interferes with the vehicle OBD system's ability to detect non-functioning or missing related parts.

RESPONSE:

- (a) Maintenance Mode is not permanent and is fully reversible back to the condition as intended by the original equipment manufacturer ("OEM"). Maintenance Mode is designed to assist maintenance departments to repair, maintain and clean the vehicle's

emission systems. Maintenance Mode is further designed to maintain the vehicle safely after the vehicle's original emission system has failed.

(b) The Maintenance Mode feature does not prevent diagnostic trouble codes.

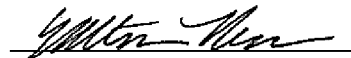
(c) The Maintenance Mode feature does not interfere with the vehicle OBD system's ability to detect non-functioning or missing related parts.

4. Provide the Maintenance Mode Description sheet noted at the bottom of Table 2.

RESPONSE: See attachment marked "Maintenance Mode Description."

Please let me know if you need anything else to assist you in your Request For Information. You may contact me by the email provided above.

Respectfully,



Matthew I. Barlow,
The Barlow Law Firm, LLC

cc: Ryan Bickmore

Maintenance Mode Description

Gear Box Z Electron EM 1.0 User Manual

Plugging In the Unit

Locate the OBD II port below the steering wheel at the driver's seat. Remove the OBD II to mini USB cord from the package. Use it to connect the Electron EM 1.0 to the OBD II port. Turn the key on, with the engine off. The unit will power up automatically.

The Boot-up Screen

The first screen to appear will be a 'Check System' screen, which will check its own physical hardware, including the SD card. This screen will also load the Electron's firmware, or operating system, and briefly display the serial number to the unit. The screen will then show the Gear Box Z logo, and once again the serial number, along with the version number of the operating system while playing a sound effect. For a short amount of time, it will indicate that the product is searching for a vehicle while displaying a pair of gears near the top right corner. Then the 'Vehicle' page from the main menu will appear. You can visit this page and view the information displayed here later. Then the Main Menu will appear.

Introduction to the Main Menu

The Main Menu will appear after the 'Vehicle' page is displayed briefly whenever the Electron boots up. All features except Emergency Recovery are accessed through this Main Menu. If the Main Menu is left for several seconds, it will open 'Gauges' automatically. This is the icon found in the top left position of the Main Menu. The Main Menu can be opened from anywhere, by selecting an "Exit" button until it appears, selecting a "Menu" button, or touching the center of the screen, depending on what window or page is open. The options available at the Main Menu are 'Gauges,' 'Add-ons,' 'Info,' 'Codes,' 'Vehicle,' and 'Configuration.' The Electron's serial number and its current firmware version number are also displayed at the bottom of the menu.

'Gauges'

When the 'Gauges' option is either selected from the Main Menu, or opens on its own by default, the 'Dash' screen is displayed first. This screen has a large dial and digital speedometer in the middle to left side of the screen, with a list of other vehicle gauges displayed on the right side of the screen. Below the speedometer there and icon that looks like a graph and next to it is Add-On Specific controls or gauges. The graph icon opens more custom gauge screens. There

are tabs along the bottom of the screen in this menu which can be selected and displayed at will. All of these gauges are customizable using Electron Gauge Designer.

‘Add-ons’

The Electron has the option for 'Add Ons' that can be tools or vehicle software changes. These 'add ons' can allow you to change vehicle specific parameters or implement vehicle software changes for improving things like: engine performance, better fuel mileage or help facilitate maintenance of your vehicle's systems. Having add-ons is not required for using the Electron. Add-ons are purchased as a separate software item from Gear Box Z. Some Add-Ons may require you to agree to a disclaimer in order to use that Add-on. You must agree to the disclaimers for the Electron EM 1.0 also.

Gathering Information

When the 'Add-ons' icon is selected from the menu for the first time, the Electron will ask for permission to gather information from the vehicle's computer. Selecting yes will start the process of gathering data. Selecting no will return to the Main Menu. Once the 'Gathering Information' process has started, it will take approximately 15 to 20 minutes to complete. The Electron will display a percentage to completion during the process, and an animation of a pair of gears near the top right corner of the screen will indicate that the process is working. Please note that you may need to wait for a few seconds to a minute after the screen indicates 100% to open the list of purchased add-ons.

After the list of add-ons appears, there will still be a 'Gather' button in the center of the bottom of the screen. This is available so that if there is some new software or features on the vehicle in the future, the 'Gathering Information' process can be repeated and keep the Electron up to date.

Please refer to the specific user manual for each add-on, included with the Electron if they have been purchased at the same time.

Installing Add-ons in the Correct Order

When the list of add-ons appears, there will be a button next to each one to select in order to install. It is important to note, however, that if you have the "Maintenance" add-on, that this must be installed last. If it is installed first, then all other add-ons will not be able to install until after it has been uninstalled. Other add-ons may be installed with the "Maintenance" add-on, but they must be installed first.

The 'Settings' Add-on

This add-on does not change the programming the vehicles computer. It is used to change the given tire size so the speedometer will calculate travel speed correctly. It also allows the user

to change the speed limiter, setting the speed at which the governor will stop acceleration. These settings will be reset every time other add-ons are installed. This means that changes to the 'Settings' add-on should be done after all other add-ons have been programmed, including the "Maintenance" add-on.

Return to Stock Feature

The 'Return to Stock' button is on the bottom left of the screen when the 'Add-ons' window is opened. Selecting this will restore the vehicle to the original manufacturer's programming. This feature makes the Electron Add-Ons fully reversible.

'Info'

This page shows how many add-ons have been installed and activated, as well as the serial number and firmware version number. This screen is very useful when talking to technical support from Gear Box Z Inc., available by calling 877-217-1911.

'Codes'

This window is used to display and clear DTCs, or Diagnostic Trouble Codes. If any codes are present, a 'display' button will appear near the top right corner of the screen. After selecting this, the number and description of each code will be displayed. If the codes fill more than one page, a 'more' button will appear at the bottom right of the screen. If not, then a clear button will be in this position. If the codes fill more than one page, select the 'more' button until you reach the last page in order to find the 'clear' button. There will always be an 'exit' button available on every page. If there are no codes to clear, or if you have cleared the codes, it will be the only option in the window to select. Included with the Electron is a booklet which contains a list of known DTCs.

'Vehicle'

This page is displayed briefly each time the Electron is plugged into the vehicle. This page serves to quickly and conveniently display information about the vehicle. It includes the year, make, model, engine, a calibration number (CAL), a transmission control module number (TCM), a vehicle code (CODE), an install code, and the VIN number at the bottom.

'Configuration'

The 'Config' icon on the Main Menu will take you to another menu that provides user changeable settings for the Electron. These include settings for the display, the audio, general, and a simplified manual within the Electron.

Display

In the 'display' window there is a slider on the right side of the screen which changes the sensitivity of the light sensor which changes the screen to "Night Mode" when the surroundings become dark. *(The purpose of this feature is to make so that the screen is not too bright and distracting to the driver if the Electron is mounted on the dash or console in the interior of the vehicle.)* Move the slider back and forth to find the brightness that is best for switching from "Day Mode" to "Night Mode."

On the left side of the 'display' window there are buttons for changing how bright the "Night Mode" will be when low light levels are detected. Whichever button has been selected last will be the brightness of "Night Mode." Please beware that the 'Low' setting will make the screen very difficult to see if the Electron is not in a dark location.

Audio

In the 'audio' window there are options for turning on vibrate mode. When this is turned on, the electron will vibrate whenever a button is clicked on the screen. Selecting the 'vibrate' button toggles this option on and off. There are also 'up' and 'down' buttons for controlling the volume of the audio played by the Electron. This will change how loud the high and low warnings will be for the gauges that the Electron displays.

General

This window currently has no alterable settings. It exists for future updates which will allow customized startup animations and illustrations, as well as sound effects.

Emergency Recovery

There are many unfortunate conditions which can occur that may cause the vehicle's computer to have its programming become unreadable. This condition is sometimes called "corrupted," "scrambled," "bricked," or "blanked." When this occurs, the vehicle will not start, and may show various alarming symptoms, such as a flashing anti-theft light in the console. Fortunately, the Gear Box Z Electron EM 1.0 can resolve this issue. When the vehicle has been "bricked," the Electron will display a message upon startup saying "searching for vehicle" and "please turn the key on." There will also be a pair of gears visible in the top left corner of the screen. The Electron will not leave this screen. The solution is to select the gears. When the gears have been selected, a prompt will appear which will say "Would You Like to do any Emergency recovery?" To perform the recovery, select 'yes.' Selecting 'no' will put the Electron in mass storage device mode. This feature is for use with the Electron Gauge Designer software. After selecting 'yes,' a list of available recovery files will appear. If you have used the Electron unit before, select 'Last Vehicle.' This file will have the VIN number to the right of the button. After selecting a recovery file, an installation window will appear, which will read "Returning Stock... This will take a few minutes. Please wait..." and will display the VIN number of the file being installed. The window will indicate the progress of the installation with a '% Done' field. The

installation must not be interrupted until complete. If the installation is interrupted, the Emergency Recovery must start over. After the recovery has been completed, a screen will appear that says "RECOVERY Successful." The screen will remain for a brief moment before the Electron reboots itself. After the reboot, the Electron and the truck should be restored to its last condition before an interruption occurred.

Installing Firmware Updates

Gear Box Z Inc. is constantly working to improve the performance of the Electron EM 1.0, and add new and powerful features. Whenever a new update to the firmware is released, it can be easily installed by the user. The current method of checking for available updates is to call Gear Box Z at 877-217-1911.

When a firmware update has become available, it is installed through the micro SD card. The files that will be needed to perform the update are:

- info.dat – The file that is sent to Gear Box Z Inc. to quickly allow updating options on the Electron.
- **GBZFIRMW.BIN (It does not need to be renamed. Just copy it to the SD card. Do NOT place this file in any folder. The name cannot be changed...)**

The steps to performing the update are:

- Unplug the Electron from the vehicle.
- Remove the SD card from the Electron. This is located in a small slot on the side, and is removed by gently pressing the card inward until it clicks, and then allowed to spring outwards.
- Put the SD card into a micro SD card adapter (which is included with the Electron, although any good quality adapter will work) and plug the adapter into a PC.
- Download firmware file and any additional files provided by Gear Box Z Inc. for updating firmware.
- Copy the firmware file to the SD card and unzip any other files to the SD card in the correct folders as specified by GearBoxZ Inc.
- Safely remove the SD card adapter from the PC, and carefully install the SD card back into the Electron, once again by gently pressing it inwards inside the slot until it clicks and locks in place.
- Plug the Electron back into the vehicle.

- The electron will check the files when it boots up, and will automatically update its own firmware.

If the SD card is lost or damaged, please contact Gear Box Z tech support, and have the serial number to the Electron unit available. If you have any other further questions, call Gear Box Z tech support at 877-217-1911.

EXHIBIT E

From: Galer, Rose </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=40D0B0FE2FAF4253AB72A2F953C68B85-GALER, ROSE>
To: matt@barlowlawgroup.com
CC: Bickmore, Ryan
Sent: 9/7/2017 3:27:32 PM
Subject: RE: Gear Box Z's Response to EPA's Information Request

Mr. Barlow,

Thank you for providing responses to our follow-up questions regarding the "Maintenance Mode" offered on tuners sold by Gear Box Z. We have a few additional questions regarding the Maintenance Mode at this time.

1. The user manual for the Gear Box Z Electron EM 1.0 references the fact that the tuner can display and clear diagnostic trouble codes (DTC). When a user clears trouble codes, are the trouble codes cleared permanently (i.e., the trouble code will not re-appear unless the user returns the vehicle to the stock OEM configuration or installs another tune) or are they only cleared temporarily (i.e., the code will only be cleared for the duration the vehicle remains on and the trouble code will re-appear the next time the user starts the vehicle)?
2. When a user installs Maintenance Mode, are any of the trouble codes pre-cleared?
3. If a user installs Maintenance Mode and then installs a test exhaust pipe without a catalyst, will any trouble codes associated with a missing catalyst appear when the user next starts the vehicle?

After we have received responses to these follow-up questions, we would like to schedule a call with you and your client to discuss Gear Box Z's response to our information request.

Please let me know if you have any questions.

Best,
Rose Galer
Air & TRI Section
Enforcement Division
EPA Region 9 - San Francisco
415-947-4289 Office

From: matt@barlowlawgroup.com [mailto:matt@barlowlawgroup.com]
Sent: Wednesday, August 16, 2017 5:51 PM
To: Galer, Rose <Galer.Rose@epa.gov>
Subject: RE: Gear Box Z's Response to EPA's Information Request

Rose,

I will have them to you before the end of next week.

Thanks,
Matt


THE BARLOW LAW FIRM, LLC

HC 65 Box 537

3285 S. Hwy 389, #101

Fredonia, Arizona 86022

Office: 602-461-8863

Cell: 435-632-1525

Email: matt@barlowlawgroup.com

Web: www.barlowlawgroup.com

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----- Original Message -----

Subject: RE: Gear Box Z's Response to EPA's Information Request

From: "Galer, Rose" <Galer.Rose@epa.gov>

Date: Wed, August 16, 2017 4:24 pm

To: "matt@barlowlawgroup.com" <matt@barlowlawgroup.com>

Cc: "Bickmore, Ryan" <bickmore.ryan@epa.gov>

Mr. Barlow-

Do you have a status update on your responses to the follow-up request below?

Thanks,
Rose Galer
Air & TRI Section
Enforcement Division
EPA Region 9 - San Francisco
415-947-4289 Office

From: matt@barlowlawgroup.com [<mailto:matt@barlowlawgroup.com>]

Sent: Monday, July 24, 2017 12:34 PM

To: Galer, Rose <Galer.Rose@epa.gov>

Subject: RE: Gear Box Z's Response to EPA's Information Request

Rose,

I forwarded the questions to my client. I will provide answers as soon as my client gets back with me.

Thank you,
Matt Barlow


THE BARLOW LAW FIRM, LLC

HC 65 Box 537

3285 S. Hwy 389, #101

Fredonia, Arizona 86022

Office: 602-461-8863

Cell: 435-632-1525

Email: matt@barlowlawgroup.com

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----- Original Message -----

Subject: Gear Box Z's Response to EPA's Information Request

From: "Galer, Rose" <Galer.Rose@epa.gov>

Date: Mon, July 24, 2017 11:58 am

To: "matt@barlowlawgroup.com" <matt@barlowlawgroup.com>

Cc: "Bickmore, Ryan" <bickmore.ryan@epa.gov>

Mr. Barlow,

We have received Gear Box Z's response to our information request and are currently reviewing the information. The materials frequently refer to "Maintenance Mode," and we would like to know more about its purpose and function. Specifically:

1. Are all of the tuners listed in Table 2 equipped with Maintenance Mode when they are purchased from the supplier or is that a feature that Gear Box Z adds?
2. Who developed the Maintenance Mode calibration?
3. Provide a more detailed description of how Maintenance Mode works, including how it prevents diagnostic trouble codes or interferes with the vehicle OBD system's ability to detect non-functioning or missing emission related parts.
4. Provide the Maintenance Mode Description sheet noted at the bottom of Table 2.

Please do not hesitate to reach out if you have any questions about this follow-up request.

Thank you,

Rose Galer

Air & TRI Section

Enforcement Division

EPA Region 9 - San Francisco

415-947-4289 Office

EXHIBIT F



HC 65 Box 537
3285 S. Hwy 389, #101
Fredonia, AZ 86022
(602) 461-8863
matt@barlowlawgroup.com

September 22, 2107

VIA E-MAIL

Matt Salazar, Manager, Air Enforcement Office
Enforcement Division
Attn: Rose Galer, Environmental Protection Specialist
U.S. Environmental Protection Agency, Region IX
75 Hawthorne St. (ENF-2-1)
San Francisco, CA 94105

Re: **IN THE MATTER OF GEAR BOX Z, INC.**
Response to Email Dated September 7, 2017.

Rose Galer:

Please see the following responses to each question:

1. The user manual for the Gear Box Z Electron EM 1.0 references the fact that the tuner can display and clear diagnostic trouble codes (DTC). When a user clears trouble codes, are the trouble codes cleared permanently (i.e., the trouble code will not re-appear unless the user returns the vehicle to the stock OEM configuration or installs another tune) or are they only cleared temporarily (i.e., the code will only be cleared for the duration the vehicle remains on and the trouble code will re-appear the next time the user starts the vehicle)?

RESPONSE: When a user clears a trouble code, the codes are only temporarily cleared. If the trouble occurs again or still remains, the trouble code will come back.

2. When a user installs Maintenance Mode, are any of the trouble codes pre-cleared?

RESPONSE: Any clearing of trouble codes are temporary. If the trouble exists after clearing, the trouble codes will come back.

3. If a user installs Maintenance Mode and then installs a test exhaust pipe without a catalyst, will any trouble codes associated with a missing catalyst appear when the user next starts the vehicle?

RESPONSE: Maintenance Mode and the test exhaust pipe do not modify anything on the catalyst.

Please let me know if you need anything else to assist you in your Request For Information. You may contact me by the email provided above. Let me know when you would like to schedule a conference call with my client and I to discuss the response to your information request.

Respectfully,

Matthew I. Barlow,
The Barlow Law Firm, LLC

cc: Ryan Bickmore

EXHIBIT G



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

7016 1370 0000 0749 1224

Jerry Black, Owner
Gear Box Z, Inc.
55 North Pioneer St. #2246
Colorado City, AZ 86021

Agent for Service of Process:
Incorp Services Inc.
2233 W Royal Palm Rd, Suite J
Phoenix, AZ 85021

Re: Notice of Violation of the Clean Air Act

Mr. Black:

The United States Environmental Protection Agency has investigated and continues to investigate Gear Box Z, Inc. ("Gear Box Z") for compliance with the Clean Air Act ("CAA" or "the Act"), 42 U.S.C. §§ 7401–7671q, and its implementing regulations. As summarized in this Notice of Violation, the EPA has determined that Gear Box Z manufactured and sold parts or components for motor vehicles and motor vehicle engines that bypass, defeat, or render inoperative elements of design that were installed by the original equipment manufacturer in order to comply with CAA emission standards, and knew or should have known that these parts or components were for such use or put to such use. Therefore, Gear Box Z has violated Section 203(a)(3)(B) of the Act, 42 U.S.C. § 7522(a)(3)(B).

Law Governing Alleged Violations

This Notice of Violation arises under Part A of Title II of the Act, 42 U.S.C. §§ 7521–7554, and the regulations promulgated thereunder. These laws were enacted to reduce air pollution from mobile sources of air pollution. In creating the Act, Congress found, in part, that "the increasing use of motor vehicles . . . has resulted in mounting dangers to the public health and welfare."¹ Congress' purpose in creating the Act, in part, was "to protect and enhance the quality of the Nation's air resources so as to promote the public health and welfare and the productive capacity of its population," and "to initiate and

¹ CAA § 101(a)(2), 42 U.S.C. § 7401(a)(2).

accelerate a national research and development program to achieve the prevention and control of air pollution.”²

The EPA’s allegations here concern parts or components for motor vehicles and engines subject to emission standards.³ The Act requires the EPA to prescribe and revise, by regulation, standards applicable to the emission of any air pollutant from new motor vehicles or engines that cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare.⁴ As required by the Act, the emission standards “reflect the greatest degree of emission reduction achievable through the application of [available] technology.”⁵ Motor vehicles and engines are subject to specific emission standards for each pollutant, based on a vehicle’s or engine’s class and model year.⁶

Vehicle and engine manufacturers employ many devices and elements of design to meet emission standards. *Element of design* means “any control system (i.e., computer software, electronic control system, emission control system, computer logic), and/or control system calibrations, and/or the results of systems interaction, and/or hardware items on a motor vehicle or motor vehicle engine.”⁷ For example, manufacturers employ retarded fuel injection timing as a primary emission control device for emissions of oxides of nitrogen (“NOx”). Manufacturers also employ certain hardware devices as emission control systems to manage and treat exhaust to reduce levels of regulated pollutants from being created or emitted into the ambient air. Such devices include diesel particulate filters (“DPFs”), exhaust gas recirculation (“EGR”), diesel oxidation catalysts (“DOC”), nitrogen oxide absorbing catalysts (“NAC”), and selective catalytic reduction (“SCR”). Modern vehicles and engines are equipped with electronic control modules (“ECMs”). ECMs continuously monitor engine and other operating parameters and control the emission control devices, such as the fueling strategy.

Manufacturers further employ onboard diagnostics, or “OBD,” which is comprised of systems that monitor components that can affect the emission performance of a motor vehicle, detect problems with the vehicle’s emission-related systems that could cause the vehicle to fail to comply with the CAA’s emission standards, alert drivers to these problems, and store electronically-generated malfunction information.⁸ If a problem is detected, the OBD system illuminates a warning lamp on the vehicle instrument panel to alert the driver. Given these functions, the OBD is part of a motor vehicle’s emission control system.

To ensure that every new motor vehicle or engine legally sold, offered for sale, imported, delivered for introduction into commerce, or introduced into commerce in the United States (collectively, “introduced into commerce”) satisfies applicable emission standards, the EPA implements a certification program. Under this program, the EPA issues certificates of conformity (“COCs”), thereby qualifying motor vehicles and engines for introduction into commerce.⁹ To obtain a COC, an OEM must submit a COC

² CAA § 101(b)(1)–(2), 42 U.S.C. § 7401(b)(1)–(2).

³ See generally 40 C.F.R. Part 86, Subpart A (setting emission standards for these categories).

⁴ CAA § 202(a)(1) and (3)(B), 42 U.S.C. § 7521(a)(1) and (3)(B).

⁵ CAA § 202(a)(3)(A)(i), 42 U.S.C. § 7521(a)(3)(A)(i).

⁶ See, e.g., heavy-duty diesel engine emission standards at 40 C.F.R. §§ 86.004-11, 86.007-11, 86.099-11 and light-duty vehicle emission standards at 40 C.F.R. § 86.1811-04. See also 40 C.F.R. §§ 86.090-8 (1990 and later model year light-duty vehicles); 86.094-9 (1994 and later model year light-duty trucks); 86.001-9 (2001 and later model year light-duty trucks); 86.004-9 (2004 and later model year light-duty trucks); 86.091-10 (1991 and later model year Otto-cycle heavy-duty engines and vehicles); 86.008-10 (2008 and later model year Otto-cycle heavy-duty engines and vehicles).

⁷ 40 C.F.R. § 86.094-2.

⁸ See CAA § 202(m), 42 U.S.C. § 7521(m), requiring EPA to promulgate regulations requiring OBD systems for motor vehicles after 2007. See also 40 C.F.R. §§ 86.005-17, 86.007-17, 86.1806-05, and 86.1806-17.

⁹ 40 C.F.R. § 86.007-30.

application to the EPA for each engine family and each model year in which it intends to manufacture or import motor vehicles or engines for introduction into commerce. The COC application must include, among other things, identification of the covered engine family, a description of the motor vehicle or engine and its emission control systems, all auxiliary emission control devices (“AECDs”)¹⁰ and the engine parameters they sense, as well as test results from a test vehicle or engine showing that it satisfies the applicable emission standards.¹¹

The Act makes it a violation “for any person to remove or render inoperative any device or element of design installed [by an original equipment manufacturer (“OEM”)] on or in a motor vehicle or motor vehicle engine in compliance with regulations under this subchapter prior to its sale and delivery to the ultimate purchaser, or for any person knowingly to remove or render inoperative any such device or element of design after such sale and delivery to the ultimate purchaser.”¹² It is also a violation to cause any of the foregoing acts.¹³

In addition, the Act makes it a violation “for any person to manufacture or sell, or offer to sell, or install, any part or component intended for use with, or as part of, any motor vehicle or motor vehicle engine, where a principal effect of the part or component is to bypass, defeat, or render inoperative any device or element of design installed on or in a motor vehicle or motor vehicle engine in compliance with regulations under this subchapter, and where the person knows or should know that such part or component is being offered for sale or installed for such use or put to such use.”¹⁴ It is also a violation to cause any of the foregoing acts.¹⁵

Alleged Violations

Based on Gear Box Z’s responses to the EPA’s information request dated April 24, 2017, issued pursuant to Section 208(a) of the CAA (“Information Request”), the EPA has determined that Gear Box Z manufactured, offered for sale, and/or sold, from January 1, 2015 to April 24, 2017, hardware and software designed for use on motor vehicles or engines, primarily light-duty and light heavy-duty diesel trucks and engines, manufactured by entities such as Cummins Inc. (“Cummins”); FCA US LLC and its predecessors (“FCA”); General Motors Co. (“GM”); and Ford Motor Co. (“Ford”). Gear Box Z manufactured and/or sold three main categories of “defeat device” products: exhaust replacement pipes; EGR block plates; and tuners packaged with DPF emulators.

¹⁰ An AECD is “any element of design which senses temperature, vehicle speed, engine RPM, transmission gear, manifold vacuum, or any other parameter for the purpose of activating, modulating, delaying, or deactivating the operation of any part of the emission control system.” 40 C.F.R. § 86.082-2.

¹¹ 40 C.F.R. §§ 86.004-21, 86.007-21, 86.094-21, 86.096-21; *see also* EPA, *Advisory Circular Number 24-3: Implementation of Requirements Prohibiting Defeat Devices for On-Highway Heavy-Duty Engines* (Jan. 19, 2001).

¹² CAA § 203(a)(3)(A), 42 U.S.C. § 7522(a)(3)(A).

¹³ CAA § 203(a), 42 U.S.C. § 7522(a).

¹⁴ CAA § 203(a)(3)(B), 42 U.S.C. § 7522(a)(3)(B).

¹⁵ CAA § 203(a), 42 U.S.C. § 7522(a).

The EPA's findings regarding Gear Box Z's manufacture and/or sale of defeat devices from January 1, 2015 to April 24, 2017 are identified in the table below:

Defeat Device Product	Gear Box Z's Product Name/Number	Effect on Motor Vehicle and Engine Emission Control Systems and Elements of Design	Approximate Quantity of Defeat Device Products Sold
Exhaust Replacement Pipes for Ford, GM, and Dodge Diesel Trucks	AFEGMP4F, AFEFP4F, AFEDP4F, AFEDPCC, AFEDP, AFEDP2, AFEFP, AFEFP2, AFEGMP-CCLB, AFEGMP-CCSB, AFEGMP-ECSB	Remove or bypass DOC, DPF, NAC, and/or SCR systems.	129
EGR Block Plates for Ford Diesel 6.4L Trucks	GBZ-FBP	Disable and/or bypass EGR systems.	866
Programmer/Tuner with DPF Emulators for Dodge Diesel 6.7L Trucks	GBZ-DD30	Enable removal of DPF without illuminating a malfunction indicator lamp ("MIL"), prompting any diagnostic trouble code ("DTC"), or causing any engine derating.	656
TOTAL			1,651

A principal effect of these products is to bypass, defeat, or render inoperative elements of the design that control emissions of regulated air pollutants. The exhaust replacement pipes and EGR block plates are designed to remove or bypass emission control hardware (including DOC, DPF, NAC, EGR and/or SCR systems), which are elements of design that manufacturers employ to meet emission standards. Similarly, the tuners and DPF emulators manufactured and sold by Gear Box Z enable removal of DPFs without illuminating a MIL, prompting any DTCs, or causing engine derating.

Gear Box Z knew or should have known that these products were manufactured, offered for sale, or sold to bypass, defeat, or render inoperative elements of design that control emissions of regulated air pollutants, based upon the functions of Gear Box Z's products, Gear Box Z's advertisements regarding the products, and Gear Box Z's responses to the EPA's Information Request, as discussed further below.

Gear Box Z offered for sale and sold exhaust pipes that were manufactured by Advanced Flow Engineering, Inc. ("aFe") that do not incorporate exhaust aftertreatment emission control devices and are designed to bypass or remove the OEM exhaust systems containing, for example, DOC, DPF, NAC, and/or SCR systems. Many of these components were advertised by Gear Box Z as "delete" pipes. For example, Gear Box Z had an advertisement on its website www.gearboxz.com which stated:

AFe CAB & CHASSIS RACE EXHAUST FOR DODGE TRUCKS (AFEDPCC)*Exhaust for Dodge Trucks 2007.5-2010**aFe Cab & Chassis DPF Delete Race Exhaust (Stainless Steel).¹⁶*

In response to the EPA's Information Request, Gear Box Z admitted that the exhaust replacement pipes manufactured by aFe enable removal of DOC, DPF, and/or NAC.

Gear Box Z also manufactured and sold plates designed to bypass EGR systems ("EGR Block Plates"). Gear Box Z had an advertisement on its website www.gearboxz.com for the EGR Block Plates which stated:

Product Information:

The EGR Block Plates are designed to be fully reversible for trucks equipped with EGRs. This part number comes with 2 pieces. These plates require a programmer to work properly.

Features:

- *Can help Increase Fuel Economy*
- *Can help Increase Performance*
- *Decreases Soot loading in Intake*
- *Solves EGR Mechanical Issues*
- *Easy Install*
 - *No Drilling*
 - *No Cutting*
 - *No Welding*

Includes:

- *Top Block Plate*
- *Bottom Block Plate¹⁷*

Gear Box Z's installation instructions for the EGR Block Plates demonstrate that the purpose of the EGR Block Plates is to block exhaust gas from recirculating, thereby disabling the EGR system. In response to the EPA's Information Request, Gear Box Z admitted that the EGR Block Plates are designed to bypass EGR systems.

Gear Box Z also manufactured and sold aftermarket ECM programmers (i.e., tuners) packaged with DPF emulators. The tuners and DPF emulators enable removal of DPFs without illuminating a MIL, prompting any DTCs, or causing engine derating. Gear Box Z had an advertisement on its website www.gearboxz.com for the tuner and DPF emulator which stated:

DODGE 3.0 (GBZ-DD30)***Product Information:***

3.0 for Dodge Cummins 6.7L 2007.5-2012 trucks. The 3.0 is designed to be a fully reversible and temporary DPF maintenance for trucks equipped with DPF filters. This is the electronics only for use with a racing exhaust kit or maintenance pipe.

¹⁶ Webpage captured from <https://gearboxz.com/collections/exhaust-systems/products/afedpcc-afe-cab-chassis-dpf-delete-race-exhaust-for-dodge-trucks> (last visited November 28, 2017).

¹⁷ Webpage captured from <https://gearboxz.com/collections/ford/products/ghz-1hp-ghz-dpf-r-ford-cyrl-block-plates> (last visited November 28, 2017).

Features:

- *Emulates a perfectly clean filter facilitating a [sic] DPF maintenance.*
- *Clears DTCs*
- *Stacks with tuners and other programmers*
- *Fully reversible*
- *Easy Install*
 - *No Drilling*
 - *No Cutting*
 - *No Welding*

Includes:

- *Dodge 3.0 Electronics*
 - *Module*
 - *Emulator Harness*
 - *Tempature [sic] Emulators¹⁸*

In response to the EPA's Information Request, Gear Box Z admitted that the tuners and DPF emulators are designed to bypass DPF systems.

Furthermore, Gear Box Z knew or should have known that these products were offered for sale or installed on "motor vehicles" or "motor vehicle engines." Many products manufactured or sold by Gear Box Z were designed and marketed for use on specific makes and models of FCA, GM, or Ford motor vehicles or engines.¹⁹ FCA, GM, or Ford sought and obtained COCs from the EPA for these motor vehicles or engines. This certification unequivocally demonstrates that these vehicles and engines are "motor vehicles" and "motor vehicle engines" under the Act.

Enforcement

The EPA may bring an enforcement action for these violations under its administrative authority or by referring this matter to the United States Department of Justice with a recommendation that a civil complaint be filed in federal district court.²⁰ Persons violating Section 203(a)(3)(B) of the Act, 42 U.S.C. § 7522(a)(3)(B), are subject to an injunction under Section 204 of the Act, 42 U.S.C. § 7523, and a civil penalty of up to \$3,750 for each violation that occurred prior to November 2, 2015, and up to \$4,527 for each violation that occurred on or after November 2, 2015.²¹

¹⁸ Webpage captured from <https://gearboxz.com/collections/dodge/products/gbz-dd30-gbz-dodge-3-0-electronics> (last visited November 28, 2017).

¹⁹ Cummins engines were used in Dodge brand motor vehicles manufactured by FCA.

²⁰ CAA §§ 204, 205, 42 U.S.C. §§ 7523, 7524.

²¹ CAA § 205(a), 42 U.S.C. § 7524(a); 40 C.F.R. § 19.4.

The EPA is available to discuss this matter with you in further detail, upon your request. Please contact Ryan Bickmore, the EPA attorney assigned to this matter, within 14 days of receipt of this Notice of Violation. Mr. Bickmore can be reached at (415) 972-3058 or Bickmore.Ryan@epa.gov.

Sincerely,



Kathleen H. Johnson, Director
Enforcement Division

cc: Matthew I. Barlow
The Barlow Law Firm, LLC
HC 65 Box 537
3285 S. Hwy 389, #101
Fredonia, AZ 86022